

RECORD OF DECISION

**Interstate 405 Sepulveda Pass Widening Project
Los Angeles County, California**

April 2008

**U.S. Department of Transportation
Federal Highway Administration
650 Capitol Mall, Suite 4-100
Sacramento, CA 95814**

The environmental review, consultation, and any other action required in accordance with applicable Federal laws for this project is being, or has been, carried out by Caltrans under its assumption of responsibility pursuant to 23 U.S.C. 327.

1 INTRODUCTION

The proposed project is a project funded jointly by the California Department of Transportation (Caltrans) and the Federal Highway Administration (FHWA) and is subject to state and federal environmental review requirements. Project documentation, therefore, has been prepared in compliance with both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Caltrans is the lead agency under CEQA. In addition, FHWA's responsibility for environmental review, consultation, and any other action required in accordance with applicable Federal laws for this project is being, or has been, carried out by Caltrans under its assumption of responsibility pursuant to 23 U.S.C. §327. Some impacts determined to be significant under CEQA may not lead to a determination of significance under NEPA.

The Draft EIS was released for public review between May 22, 2007 and October 1, 2007. A Final Environmental Impact Statement (FEIS) was released for public comment on March 14, 2008 and the comment period ended on April 14, 2008.

1.1 Dates

As part of this Record of Decision (ROD), on behalf of FHWA, Caltrans is advising the public of final agency actions subject to 23 U.S.C. §139(1)(1). A claim seeking judicial review of the federal agency actions on this widening project will be barred unless the claim is filed on or before November 17, 2008. If the federal law that authorizes judicial review of a claim provides a time period of less than 180 days for filing such claim, then that short time period still applies.

1.2 Background

The Interstate 405 (I-405) corridor begins at Interstate 5 (I-5) in Orange County, in the City of Irvine, and ends at I-5 in Los Angeles County, in the City of Los Angeles near the community of Mission Hills. I-405 is a north-south route that is classified as an interstate/interregional urban highway. I-405 is a part of the National Highway System and serves as a major access route for the coastal, westside, and San Fernando Valley communities in the Los Angeles area.

The high occupancy vehicle (HOV) system along the I-405 corridor is continuous in the northbound direction from the I-405/I-5 interchange in Orange County to the State Route 90 interchange in Culver City. The I-405 Sepulveda Pass Project, described in this document, would extend the HOV lane from National Boulevard and carry it all the way through to Greenleaf Street just south of the U.S. Highway 101 (US-101) interchange. The southbound lanes between SR-90 and National Blvd. are under construction and will be completed Spring 2010. This will complete the southbound HOV lane from I-5 to US-101.

Caltrans has analyzed various alternatives to widen and rehabilitate this portion of the freeway. Project alternatives would add a 10-mile northbound carpool lane on I-405 through the Sepulveda Pass from I-10 (Santa Monica Freeway) to US-101 (Ventura Freeway). A southbound carpool lane opened for service in 2002; however, standard lanes were deferred due to

inadequate right-of-way width. Other improvements for this project include modifications to various freeway overcrossings and undercrossings and on/off-ramps.

Exceptions to design standards for southbound 405 were made on a conditional basis in a letter of approval from FHWA to Caltrans on June 21, 2005. Caltrans was expected to give full consideration to the restoration of full geometric design standards during the planning, budgeting, design and construction phases of any subsequent projects in the vicinity, including the addition of the northbound HOV lane which was under consideration at the time.

The I-405 Sepulveda Pass Project included an alternative that would restore the southbound I-405 to full standard. However, following the public comment period, and the substantial amount of comments in opposition to this alternative, it was determined that bringing southbound I-405 to FHWA design standards would come at a considerable cost to the community as well as taxpayers and the benefit provided by this alternative would not justify the cost.

2 DECISION

The selected alternative for the Interstate 405 Sepulveda Pass Widening Project is Alternative 2 – Add a Standard Northbound HOV Lane and Standardize Northbound Mixed-Flow Lanes, Median and Shoulder Alternative. Alternative 2 was identified as the preferred alternative in the Final Environmental Impact Statement (FEIS), dated February 29, 2008 which was prepared pursuant to the National Environmental Policy Act (NEPA). The FEIS considered potential construction and operational impacts to the natural and human environments that would result from a No Build Alternative and two Build Alternatives. The selection of the preferred alternative was based environmental considerations, funding availability, as well as community input and acceptance.

The selected alternative would widen I-405 to add a northbound HOV lane between National Boulevard and Ventura Boulevard, connecting with existing HOV lanes. The northbound roadway would meet current design standards for lane, median, and shoulder widths except at the I-10/I-405 interchange area and between Moraga Dr. and Sunset Blvd. interchanges. Standard lanes consist of an 11-foot half median, a 12-foot HOV lane, a 1-foot HOV buffer, five 12-foot mixed-flow lanes, and a 10-foot outside shoulder. The selected alternative would also widen the southbound I-405 to meet current design standards for lane, median, and shoulder widths at certain sections. Southbound standardization would be within the following segments: between Olympic Blvd. and Waterford Street and between Bel Air Crest to the north end of the project (just south of Ventura Boulevard). Local interchanges within the project limits would be reconstructed and improved notably at Wilshire Boulevard, Sunset Boulevard, and Skirball Center Drive.

The selected alternative is estimated at \$779.2 million, which includes \$715.2 million for construction and \$64 million for right-of-way and utility relocation.

Project construction is scheduled to begin in Spring 2009 and end in Summer 2013. The proposed project is estimated to be constructed in approximately four years. The project would

be constructed through a Design-Build contract. As a result, the timing of construction for the various project segments would be determined by the contractor to expedite construction.

Generally, there would be at least two major construction stages. The first stage could include roadway work (e.g. shoulder and ramp widening), structures, retaining walls, and sound walls along the outer shoulder. The other stages could include roadway work, concrete barrier, and structure bent construction in the median. These stages may require multiple sub-stages due to the complex nature of work. Detailed stage construction plans will be prepared during the design stage.

Property acquisition has been minimized through reducing freeway design standards at various locations where land is constrained by development. The total median has been reduced in width from 24' to 20' and the HOV buffer has been reduced from four feet to one foot and as a result, the Verizon Telephone Switching Station and Rodeo Realty buildings will not be acquired.

Most of the freeway widening required for this project would occur along the east side of I-405 along Sepulveda Boulevard between Montana Avenue and Moraga Drive and between Getty Center Drive and the northbound Getty Center off-ramp. Sepulveda Boulevard would be slightly realigned at the relocated southbound I-405 Skirball Center Drive on/off-ramps in order to add a left-turn lane to the on-ramp. Some widening would also occur along the southbound side of the freeway within the following segments: between Ohio Avenue and Waterford Street; between Bel Air Crest and Mulholland Drive; and between the southbound on-ramp from Sepulveda/Valley Vista to the north end of the project (just south of Ventura Boulevard).

The Wilshire Boulevard interchange would be improved in both directions. The northbound on-ramp from eastbound Wilshire Boulevard would be grade-separated from the northbound off-ramp to westbound Wilshire Boulevard and from Sepulveda Boulevard. The southbound off-ramp to eastbound Wilshire Boulevard would be grade-separated from the southbound off-ramp to westbound Wilshire Boulevard.

The northbound I-405 off-ramp to Montana Boulevard/Sepulveda Boulevard would be closed in order to accommodate freeway widening.

The I-405 Sunset Boulevard interchange would also be improved. The northbound I-405 off-ramp to eastbound Sunset Boulevard would be reconstructed to add another lane. The northbound I-405 on-ramp from eastbound Sunset Boulevard would have two exclusive 12-foot lanes beginning on the reconstructed Sunset Boulevard Overcrossing (OC) and continuing onto the ramp. In addition, the Sunset Boulevard OC would have three 12-foot through lanes, a 4-foot shoulder, and a 5-foot sidewalk in each direction plus a 9.9-foot median, eliminating the existing eastbound lane reduction on the bridge.

The irregular northbound I-405 on- and off-hook ramps at the Getty Center interchange would be reconfigured to a standard diamond interchange to increase stopping sight distances improving safety standards.

The southbound I-405 Skirball Center Drive interchange would be relocated approximately 1,640 feet to the south to form a "T" intersection with Sepulveda Boulevard. This would eliminate the existing intersection at the end of the southbound I-405 Skirball Center Drive off-ramp located approximately 66 feet east of the Skirball Center Drive/Sepulveda Boulevard intersection. The traffic congestion problems caused by the proximity of these two traffic intersections would be eliminated.

The southbound Valley Vista/Sepulveda Boulevard off-ramp would be reconstructed due to freeway widening.

A total of 12 soundwalls and 54 retaining walls within the project limits would be constructed at embankments where right-of-way is constrained.

A total of 12 undercrossings within the project limits would be widened. Three overcrossings, at Sunset Boulevard Skirball Center Drive and Mulholland Drive, would need to be replaced.

3 ALTERNATIVES CONSIDERED

A full range of alternatives was considered during the course of selecting a proposed project. The formulation of alternatives for analysis is discussed in Chapter 2 of the FEIS. There are two build alternatives that and a no build alternative that were evaluated for the proposed project. A full project description can be found in Chapter 2 of the FEIS.

Alternative 1: No Build

This alternative would maintain the current configuration of the existing freeway, ramps, and local intersections within the project limits.

Although the No Build Alternative is not desirable nor does it satisfy the project's purpose and need, it was evaluated in the FEIS to provide a baseline for comparison purposes, and as an alternative to the build alternatives. Further detailed discussion of the No Build Alternative is provided in Section 2.1 of the FEIS.

Alternative 3: Add a Standard Northbound HOV Lane and Standardize the Southbound HOV Lane, Mixed-Flow Lanes, Median, and Shoulder

In addition to the features described in Alternative 2, standard freeway profiles would be provided for northbound and southbound I-405 within the project limits except through the I-405/I-10 interchange. I-405 would be widened along the east side similar to Alternative 2 and along most of the west side throughout the project limits. Other changes associated with this alternative that are not a part of Alternative 2 include:

- Addition of one mixed-flow lane between Skirball Center Drive and Waterford Street;
- Closure of the southbound I-405 on-ramp from eastbound Sunset Boulevard. In conjunction with this ramp closure, the ramp intersection located immediately north of the Sunset Boulevard/Church Lane intersection would be reconfigured so that the existing island would

- be eliminated and the middle lane at the northbound approach would be changed from a through lane to a shared through/right-turn lane;
- Approximately 2,300 feet of Sepulveda Boulevard would be realigned along the west side of I-405 north of the Getty Center/I-405 interchange due to the widening planned along the west side of I-405;
 - Most of Church Lane between approximately Chenault Street and Kiel Street would be realigned to the west to facilitate the I-405 widening; and
 - A total of 13 soundwalls and 75 retaining walls within the project limits would be constructed at embankments where right-of-way is constrained.

Alternative 3 Modified

This is a design variation of Alternative 3 which would make design modifications to the freeway and Church Lane to avoid full property acquisitions in the community of Brentwood Glen. The freeway would be shifted east, the HOV buffer area and/or median area reduced, and the width of Church Lane reduced. The existing curb, sidewalk and vegetation on the west side of Church Lane would be maintained and not encroached upon.

Four other alternatives were considered during the project conceptualization phase. These alternatives consisted of the following:

Alternative A: Non-Standard Northbound HOV Lane

This was listed as Alternative 2 in the Project Study Report-Project Development Support (PSR-PDS) and proposed adding a northbound I-405 HOV lane (non-standard segment).

This alternative was rejected due to a non-standard freeway section, which did not meet mandatory design standards for traveled lane and median. It is also not consistent with the Transportation Concept Report (TCR).

Alternative B: Four-Lane HOV Viaduct Structure

This was listed as Alternative 5 in the PSR-PDS. This alternative proposed widening the existing facility to provide four standard HOV lanes on a viaduct structure over the freeway median throughout the project limits.

This alternative was rejected due to seismic stability and safety concerns on the viaduct, as stated in the I-405 HOV Viaduct Feasibility Study Memo included as Attachment 8.

Alternative C: Four-Lane HOV Viaduct Structure with Transit Enhancement

DMJM-Harris consultants studied this transit enhancement alternative during the Project Report phase. It is essentially the same as rejected Alternative B except it included the addition of direct off and on-ramps to the northbound and southbound HOV lanes in Wilshire Boulevard area.

Alternative C was rejected due to the same seismic stability and safety concerns identified as the previous viaduct structure alternative.

Alternative D: HOV Direct Access On/Off-ramps at Santa Monica Boulevard

This plan proposed a special transit/HOV isolated off-ramp. Caltrans traffic analysis shows that this off-ramp would not have enough storage. Congestion in Santa Monica Boulevard would block the off-ramp traffic and the queue on the off-ramp would affect the traffic on the mainline HOV lane. The tunnel in the drop ramp would have drainage and maintenance issues. Cost for this ramp was found to be very high. Therefore, the direct access HOV off-ramp was rejected. Since the direct access HOV off-ramp is rejected, the direct access HOV on-ramp becomes an isolated ramp. Therefore, the direct access HOV on-ramp was also rejected.

These alternatives were analyzed using the following criteria to eliminate or retain them for further consideration:

- Ability to meet the project purpose and need
- Extent of environmental impact and community disruption
- Cost-effectiveness

Based on the results of the alternatives evaluation, two build alternatives (Alternative 2 and Alternative 3), along with the No Build Alternative, were identified for consideration in the DEIS as the most reasonable and feasible. Further detailed discussion of this alternative is provided in Section 2.3 of the FEIS.

Table 1 presents the anticipated environmental impacts associated with each alternative considered in the Draft and Final EIS. A complete description of the analysis and findings can be found in Chapter 3 of the FEIS.

Table 1 – Summary of Major Environmental Impacts

Potential Impacted Resource		Alternative 2	Alternative 3	Alternative 1: No Build
Meets Project Purpose and Need		Yes		No
Land Use and Planning (Consistency with City General Plan)		Consistent		Inconsistent
Community/ Economic Impacts	Business Displacement	No Impact		
	Housing Displacement	Seven residential occupants would be displaced. Two of these homes would be removed.	37 residential properties would be displaced. *Hook-ramp design option at Valley Vista Blvd. would displace 4 residential properties. *Alternative 3 Modified would avoid 30 properties on Church Lane.	No Impact
	Environmental Justice	No Impact		
Utilities and Emergency Services		Possible intermittent utility disruption during relocation. Possible delays in response time for emergency services during construction		No Impact
Traffic/ Parking/ Pedestrian Safety	Traffic Circulation	Traffic detours and disruption during construction. Overall improvement in existing and future corridor Level of Service.		Substantial degradation of corridor Level of Service
	Transit Service	Temporary change of transit routes and bus stops during and after construction. Some operation improvement due to improved corridor Level of Service.		No Impact
	Pedestrian Access	Temporary detour of pedestrian routes during construction		No Impact
	Parking	Temporary loss of parking at the southeast corner of the federal parking lot located in the southeast corner of Wilshire Blvd.	Temporary loss of parking at the southeast corner of the federal parking lot located in the southeast corner of Wilshire Blvd. and permanent loss of street parking along Church Lane	No Impact
	Ramp Closures	Permanent closure of Montana Ave. off-ramp	Permanent closure of Montana Ave. N/B off-ramp and Sunset Blvd. S/B on-ramp	No Impact
Visual/Aesthetics		Temporary visual degradation during construction periods. Construction of soundwalls and new ramps would affect resources and views to residents adjacent to soundwalls and ramps.	Temporary visual degradation during construction periods. Construction of soundwalls and new ramps would affect resources and views to residents adjacent to soundwalls and ramps, including Church Lane.	No Impact
Historical Cultural Resources		Adverse effect to the NRHP-eligible Mulholland Dr. Bridge		No Impact
Archaeological Resources		Low likelihood of discovery of subsurface archaeological resources		No Impact

Potential Impacted Resource	Alternative 2	Alternative 3	Alternative 1: No Build
Flood Control, Hydrology, Water Quality, and Stormwater Runoff	Relocation of 4 drainages would require regulatory coordination. Increase in freeway drainage surface area.		No Impact
Geology/Soils/Seismicity	Possibility of encountering landslide prone hillsides		No Impact
Hazardous Waste/Materials	Possibility of encountering aerially deposited lead (ADL), asbestos-containing materials (ACM), and lead-based paint (LBP)		No Impact
Air Quality	Temporary emissions of criteria air pollutants during construction	Temporary emissions of criteria air pollutants during construction Alternative 3 would not be in conformity with the SIP, RTP and RTIP	Continued degradation of air quality
Noise	Intermittently exceeding noise criterion during construction		No Impact
Energy	One-time expenditure of energy to construct improvements. Overall improvement in fossil fuel efficiency of the corridor.		Increasing levels of fossil fuel consumption
Vegetation	Removal of approximately 115 mature native trees	Removal of approximately 162 mature native trees	No Impact
Wildlife	Affect 3 known wildlife crossing corridors within the project limits during project construction		No Impact
Threatened and Endangered Species	No Impact		
Section 4(f) Resources	Use of 2 trailheads and trails, including 7 parking spaces at the Getty View Trailhead. Approximately 4.0 acres to be impacted at the Getty View Trailhead and approximately 0.3 acres at Skirball Center Trailhead.		No Impact
Cumulative and Secondary Impacts	Adverse effect on NRHP-eligible Mulholland Dr. Bridge Impacts to air quality, noise, socioeconomics, wildlife corridors, traffic and circulation, and area aesthetics during construction Impact to a historical resource, post-construction No secondary impacts identified		No Impact

Section 4(f)

A Section 4(f) Evaluation (Appendix B of the FEIS) was prepared to identify the Section 4(f) resources in the project area, describe the nature and extent of the use of these significant properties, evaluate alternatives that would avoid the use of Section 4(f) resources, and describe measures to minimize harm to the affected resources. There are five identified Section 4(f) resources within approximately 0.25-miles of the selected alternative.

Section 4(f) Resource	Location	Current Ownership	Effect
Westwood Recreation Center	1350 S. Sepulveda Blvd. - Triangular parcel on the east side of the I-405 freeway (western boundary) at Ohio Ave. on the south and Sepulveda Blvd. on the east.	Public – Owned and operated by the City of Los Angeles Department of Recreation and Parks	Temporary Use
Felicia Mahood Multipurpose Center	11338 Santa Monica Blvd. - South side of Santa Monica Blvd. and the east side of Purdue Ave	Public – Owned and operated by the City of Los Angeles Department of Recreation and Parks	No Effect
Getty View Trailhead	East side of the I-405 freeway on the east side of North Sepulveda Blvd., at the North Sepulveda Blvd. on-ramp.	Public – Jointly Administered by the Santa Monica Mountains Conservancy and National Park Service	Direct Use
Skirball Trailhead	Eastside of the I-405 freeway at the southeast curve of the Skirball Center Overcrossing	Public – Jointly Administered by the Santa Monica Mountains Conservancy and National Park Service	Temporary Use
Mulholland Drive Overcrossing Bridge# 53-0739	Mulholland Drive over I-405 at postmile 37.03 in Los Angeles County.	Public – Maintained by the State of California Department of Transportation	Adverse Effect

Getty View Trailhead

Several measures to minimize harm have been developed for the Getty View Trailhead. These measures include but are not limited to: creation of a culvert to funnel wildlife; providing vegetation within Caltrans right-of-way; providing directional fencing for wildlife movement; installation of signs warning motorists of wildlife; and in-lieu fee agreements with the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority for relocation and/or reconstruction of the seven parking spaces that would be removed and for the modification/realignment of a new trail.

Mulholland Drive Overcrossing (Bridge # 53-0739)

Concurrence was received on the Finding of Effect from the State Historic Preservation Officer (SHPO) on October 18, 2006. A Memorandum of Agreement (MOA) was executed between the SHPO and Caltrans on April 2, 2008.

Westwood Recreation Center

Several measures to minimize harm have been developed for the Westwood Recreation Center. These measures include but are not limited to: building a soundwall along the shoulder edge of northbound I-405; and installing lighting (as needed) at the end of construction.

Skirball Trailhead

Several measures to minimize harm have been developed for the Skirball Trailhead. These measures include but are not limited to: removal of fencing and providing directional fencing to funnel wildlife; replanting vegetation; installation of wildlife travel paths; street light installation; and an in-lieu fee agreement to the Mountains Recreation and Conservation Authority.

With the implementation of these measures, all planning to minimize harm will have been provided, pursuant to Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended.

Measures to Minimize Harm

The selected alternative incorporates all practical measures to minimize environmental harm, which were described in the FEIS. Table 2 lists the construction and operational impacts and the mitigation measures to minimize the potential impacts identified. All measures listed are commitments imposed under this ROD for the selected alternative. This listing is provided to guide and facilitate project design and construction. This list will also facilitate the monitoring and implementation of the mitigation measures. The measures described below will either be incorporated into or implemented in conjunction with the design and/or construction for the selected alternative. A detailed description of impacts and mitigation measures can be found in the appropriate environmental resources section in Chapters 3 and 6 of the FEIS.

Table 2 – Summary of Environmental Impacts and Measures to Minimize Harm

Environmental Factor	Mitigation Measures
Land Use	<ul style="list-style-type: none">• Prior to and during construction, Caltrans will continue its outreach program by notifying the residents, businesses, and any service providers within the area. Caltrans will inform the surrounding communities about the project construction schedule, relocation arrangements and assistance programs, traffic-affected areas and the Traffic Management Plan, and other relevant project information.• Information gathered through Caltrans' community outreach program will be used to develop the construction traffic control plans and alternate access routes to maintain critical business activities. Caltrans staff will inform the public of its progress in implementing the measures selected through periodic project newsletters sent to businesses, residents, and property owners within close proximity to the project. Staff will be assigned to work directly with the public to provide project information and resolve construction-related problems.• Caltrans staff will contact and interview individual businesses potentially affected by construction activities. Interviews with commercial and industrial businesses will be conducted in order to understand and identify business usage; delivery and shipping patterns; frequented travel routes of customers and clients upon entering and exiting the business establishment; parking requirements; hours of operation; and critical times of the day and year for business activities.• Parcels subject to full acquisition shall be reconfigured or combined with adjacent parcels to allow for development commensurate with previous land uses. Commercial and

	<p>industrial land uses subject to partial acquisitions should be reconfigured on site in such a manner as to remain in operation. Reconfigurations of remnant properties will need to comply with local codes.</p> <ul style="list-style-type: none"> • A Caltrans in-lieu fee agreement will be established with the Santa Monica Mountains Recreation and Conservation Authority for the relocation of seven (7) parking spaces that will be removed and for the modification/realignment of a new trail at the Getty View Trailhead and the new Skirball Trailhead. • Caltrans will provide for one additional light at the Bad News Bears baseball field in Westwood Park, as needed.
Relocation Impacts	<ul style="list-style-type: none"> • Relocation assistance and counseling will be provided to displaced persons and businesses in accordance with the Federal Uniform Relocation Assistance and Real Properties Acquisition Policies Act, as amended, to ensure adequate relocation for displaced persons and businesses. All eligible displacees will be eligible for moving expenses. All benefits and services will be provided equitably to all relocates without regard to race, color, religion, age, national origins and disability as specified under Title VI of the Civil Rights Act of 1964. • Owners of property to be acquired due to the proposed project will be compensated for the fair market value of the property as well as damages, if any, to the remainder of portions of the property in accordance with the Federal Uniform Relocation Assistance and Real Properties Acquisitions Polices Act, as amended.
Community Impacts	<ul style="list-style-type: none"> • Pedestrian access points to businesses within the construction area will be maintained throughout the construction period. If usual access points were lost, provisions for alternative access to the affected parcels will be made. Appropriate signage will be placed to inform and direct both pedestrian and vehicular traffic to local businesses via alternate routes. Temporary sidewalks, if necessary, will be installed during the construction phase. Disabled access will be maintained during construction where feasible. • During construction, Caltrans staff will establish an information field office near the construction site. The field office will serve the following multiple purposes: <ul style="list-style-type: none"> – Provide the community and businesses with a physical location where information pertaining to construction can be exchanged; – Enable Caltrans staff to better understand community/business needs during construction; – Notify property owners, residences, and businesses of major construction activities; – Respond to phone inquiries; and – Coordinate business outreach programs. • Information and field office telephone numbers will be available to provide community members and businesses a means of direct communication regarding construction activities. Caltrans staff will review and forward calls to the appropriate party for action. Community involvement specialists will be available for solving individual problems, handling construction complaints, providing general information, and providing information such as current project schedule, dates for upcoming community meetings, and notice of construction impacts. • Caltrans will coordinate with the affected communities and all of the schools in the Institutional Use Corridor to develop a list of contacts for Caltrans to provide information regarding construction-related updates. • A Traffic Management Plan will be developed to maintain access to all businesses near construction activity. For example, mitigation measures to alleviate traffic impacts include: 1) avoiding access points to construction sites on residential streets and posting speed limits of 25 mph along the streets in the vicinity of the construction sites; and 2) preparing specific traffic mitigation plans for each construction site, including detour routes, lane assignments, and vehicular and pedestrian traffic circulation and control.

Utilities	Utility infrastructure affected by project construction will be relocated before construction, relocated during construction, protected in place, or abandoned. Those utilities that must be relocated as a part of project construction will be relocated in such a manner as to minimize any disruption of service those utilities provide. Utilities that require relocation will be replaced and there is a possibility of undergrounding utilities along Sepulveda Blvd. as necessary and will be determined by the affected utility company and Caltrans.
Emergency Services	<ul style="list-style-type: none"> The impact to fire, police and emergency service response times will be minimized by the implementation of a Traffic Management Plan (TMP) that will contain detailed plans of access routes and detours during construction. The TMP should be reviewed and approved by any potentially affected fire or law enforcement agency. Caltrans will maintain contact with the community, police and fire protection services through public outreach during the construction phase. Traffic assistance personnel will be required to be on-site in emergency situations.
Traffic and Transportation	<ul style="list-style-type: none"> Implement an effective Traffic Management Plan (TMP) that will include detailed construction staging plans and analysis of how traffic will be affected during construction; During development of the TMP, Caltrans will explore the City's current stipulation imposed on the community. Caltrans will continue to work with the Bel Air Crest community and if traffic during construction becomes an issue, additional measures will be taken to alleviate any prolonged construction delays, including the temporary use of Casiano Road; Construction phasing plans will emphasize traffic operations and traffic safety; Maintain the number of existing traffic lanes on the freeway and busy ramps during peak traffic periods; Construct the improvements at the Wilshire Boulevard, Sunset Boulevard, and Getty Center Drive interchanges prior to closing the Montana Avenue off-ramp; Construct the new southbound Skirball Center Drive/Sepulveda Boulevard on/off-ramps prior to closing the existing ramps; Coordinate with MTA, Antelope Valley Transit, LADOT, Santa Clarita Transit and Santa Monica's Big Blue Bus to provide rerouting information, including operating schedules, to public users at least one week in advance to minimize impacts; Obtain a permit from the Federal Land Agency for an aerial highway easement and a portion of the federal parking lot area at the southeast corner of Wilshire Blvd. and Sepulveda Blvd. Caltrans will replace the loss of parking spaces in adjacent land belonging to Caltrans; Construct a southbound left-hand turn pocket and signal on Sepulveda Blvd. at Homedale Street; Coordinate with the City of Los Angeles to adjust signal timing, directional signing, and other detailed traffic mitigation mutually agreed to during final design; Widen the north side of Wilshire Boulevard between northbound I-405 off-ramp to westbound Wilshire Boulevard and the southbound I-405 on-ramp to improve the traffic flow of Wilshire; Widen Sepulveda Boulevard south of Wilshire Boulevard to 104 feet; Prepare updated Freeway Agreements and work with the City of Los Angeles to secure approval; Utilize staged construction processes to manage the traffic impact caused by the construction of new bridges at Mulholland Drive, Skirball Center Drive and Sunset Boulevard. In order to maintain current travel routes, all bridges will be reconstructed with at least one-half of their existing lanes remaining open to traffic during construction; and The "UCLA Next Exit" sign along the approach of Wilshire Boulevard of the I-405 will be replaced. No two consecutive overcrossings and/or street intersections shall be closed at any one time.

Visual and Aesthetics	<ul style="list-style-type: none"> • Sound and retaining walls will be designed to be visually compatible with the surrounding community (community identification). Use architectural detailing such as pilasters, wall caps, interesting block patterns, color and materials to match the existing color palette of the surrounding area. This detailing will be used to add visual interest and reduce the apparent height of the walls; • Structure façade surface treatments will be selected to mimic a stone or rock-type look in areas where there are mountain views, consistent with Caltrans' safety standards; • Aesthetic treatments and decorative railing/fencing on bridges and overcrossings will be selected to bring out matching elements of the community or character of the surrounding area; • Slope paving or vegetation at undercrossings will be enhanced with texture to deter graffiti where appropriate; • Consideration will be given to color and materials for retaining walls along hillsides in order to ensure compatibility with the landscape; • New light standards will be chosen to add a low level of new lighting that would have a modest effect in the relationship to existing light sources surrounding the area. The proposed lighting will use lamps and light shields to minimize impacts on nocturnal animal species and limit spill-over lighting to surrounding areas during and after construction; • All new street lighting to be installed in accordance with lighting specifications using the lowest level of illumination/brightness to meet safety needs while minimizing glare; • Native vegetation to be planted in disturbed areas where space allows. Coordination will be required between the District Landscape Architect and District Environmental Branch throughout project design to select appropriate vegetation replacement; and • Non-native (ornamental) vegetation will be planted in disturbed areas where space allows. • Coordination with the communities within the I-405 corridor will be conducted once the Design-Build contractor is selected.
Water Quality & Stormwater Runoff	<p>For both short-term (construction) and long-term (operational) water quality impacts, temporary, as well as permanent Best Management Practices (BMPs) will be identified during the project's final design stage, when there are sufficient engineering details available to warrant competent analysis. In addition, the following mitigation measures will be carried out:</p> <ul style="list-style-type: none"> • The proposed project will be subject to the NPDES permitting process which contains standard provisions intended to provide a required level of storm water pollution prevention. • Caltrans will coordinate with the Metropolitan Water District's 3rd Party Group to include the Metropolitan Water District's technical requirements in the project's technical provisions. • A Water Pollution Control Plan will be developed by the contractor, and approved by Caltrans, as well as Federal, State and local resource agencies. This Plan will incorporate the resource agency approved methodology as well as all other appropriate techniques for reducing impacts to water quality. • A Construction Storm Water Pollution Prevention Plan (SWPPP) will be prepared prior to the start of construction to ensure compliance with existing NPDES permits. The SWPPP will identify potential sources of pollutants, describe erosion and sediment controls, contain non-storm water provisions, describe post-construction storm water management, describe waste management activities, include a maintenance and inspection component, include a list of contractors, incorporate other storm water related plans if applicable, and will list the name of the preparer. • Caltrans will conduct additional inspections or analysis if required by the RWQCB, inspect construction sites prior to anticipated storm events and after actual events in order to identify areas contributing to storm water discharge pollutants in order to evaluate the adequacy of the control measures identified in the SWPPP, certify annually that construction is in compliance with the applicable NPDES permit and SWPPP, and retain the monitoring records for at least three years following completion of construction.

	<ul style="list-style-type: none"> The Storm Water Data Report for this project includes treatment Best Management Practices (BMPs), design BMPs, and temporary construction BMPs to prevent sediment and other pollutants from entering the storm drain system. Six treatment BMPs (i.e. Infiltration Trench, Retention Basin, and Bio Swales) are proposed for incorporation into the project (see Figure 3.10-1: Proposed Storm Water Treatment BMP Locations). Type selection and final location of the proposed devices will be determined during final design. Caltrans will obtain necessary permits pursuant to Sections 401 and 404 of the Clean Water Act, as well as California Fish and Game Code 1601. The resource agencies that issue these permits often impose additional avoidance, minimization, and mitigation measures as part of the conditions of the permits. Caltrans shall comply with all permit conditions.
Hydrology & Floodplains	<p>Appropriate drainage and/or pumping systems will be incorporated into the design of the project to control localized flooding or ponding on the freeway. In areas of shallow groundwater, the placing of subdrains or utilizing groundwater pumps will drain freestanding water. Construction activities in flood control channels will only be scheduled to occur during the dry season (April 1-October 31). If construction during that time is not possible, a suitable water diversion plan will be developed and implemented to minimize impact to water quality. Permits will be obtained prior to construction in the channels. A 1602 Streambed Alteration Agreement will be obtained from CDFG. In addition, a 404 permit from the U.S. Army Corps of Engineers and a 401 Certification/Waiver from the Regional Water Quality Control Board may be required.</p>
Geology & Soils	<ul style="list-style-type: none"> Widening the existing structures and constructing new retaining walls will require additional subsurface exploration for potential liquefaction from Santa Monica Boulevard to Wilshire Boulevard (post miles 30.73 to 32.1). To mitigate against liquefaction, new piles required for structural support will be placed to a depth below the zones of potential liquefaction to protect structures from this hazard. Because the area could experience earthquakes with ground movement, the structures and the highway will be built to withstand these movements utilizing the latest technology and design details. Insufficiently compacted native material in the immediate area of construction will be removed and re-compacted to 90 percent in cut areas and replaced with an imported sub-base in structural sections. In fill areas above natural ground, the natural material will be removed until dense material is reached and replaced as a compacted fill. It is recommended that fill slopes be treated immediately after construction with planting, hydroseeding or paving to reduce erosion.
Cultural & Historical Resources	<ul style="list-style-type: none"> Concurrence was received on the Finding of Effect from the State Historic Preservation Officer (SHPO) on October 18, 2006. A Memorandum of Agreement (MOA) was executed between the SHPO and Caltrans on April 2, 2008. Should buried cultural materials be encountered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until an assigned qualified archaeologist can assess the nature and significance of the find. If human remains are discovered, further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the County Coroner will be contacted. If the remains are thought to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendent (MLD). At this time, the person who discovered the remains should contact Gary Iverson, <i>District 7, Historic Resource Coordinator</i> so that they may work with the MLD on the respectful treatment and disposition of the remains.
Hazards and Hazardous Materials	<ul style="list-style-type: none"> Perform a subsurface investigation within the proposed permanent easement (PE) and temporary construction easement (TCE) adjacent to the Veterans Administration storage area property on the west side of I-405 to assess the soil and groundwater for petroleum hydrocarbons and volatile organic compounds due to current and historical storage of potentially hazardous materials. Perform a subsurface investigation within the proposed PE and TCE next to the Richfield

	<p>Oil Company property on the west side of I-405 to assess the soil and groundwater for petroleum hydrocarbons and volatile organic compounds due to current and historic oil exploration, production, and storage.</p> <ul style="list-style-type: none"> • The underground storage tank at the Verizon property (formerly GTE, proposed right-of-way property) at 598 Sepulveda Boulevard should be properly closed by removal, in accordance with local regulations. A subsurface investigation should be performed to assess the soil and groundwater for petroleum hydrocarbons and volatile organic compounds. • Perform a subsurface investigation within the proposed PE and TCE next to the dry cleaner at 641 North Sepulveda Boulevard to assess the soil and groundwater for volatile organic compounds. • Aerially deposited lead surveys will be performed along portions of I-405 where project construction activities may disturb or affect the unpaved shoulders. If excavated soil at the site is to be reused within Caltrans rights-of-way, any portion of the upper 0.9m of soil should be placed under pavement and at least 1.5m above the maximum groundwater elevation in accordance with the DTSC Lead Variance. If any portion of the upper 0.9m of soil excavated at the site is to be disposed, it should be handled as a hazardous material with respect to total and soluble lead content. Caltrans will notify contractors performing the construction activities that hazardous concentrations of lead may be present in on-site soil and that appropriate health and safety measures should be taken to minimize exposure to lead. • If apparent soil contamination is discovered during project construction activities (indicated by odors, staining, or field screening instruments), construction activities should stop at such locations and the soil should be sampled and analyzed at a state certified laboratory to determine the type(s) and concentration(s) of contaminants that may be present; special handling or disposal requirements for the soil may be necessary. • Before demolition, significant renovation or retrofitting of buildings or freeway structures in the project area, asbestos-containing material and lead-based paint surveys should be conducted by a state certified asbestos consultant. If asbestos-containing materials or lead-based paints are detected, these materials must be removed by a licensed contractor before demolition or retrofit activities.
Air Quality	<p>To reduce fugitive dust emissions the construction contractor shall adhere to the requirements of SCAQMD Rule 403. The Best Available Control Measures (BACMs) and Reasonably Available Control Measures (RACMs) specified in SCAQMD's Rule 203 Implementation Handbook shall be incorporated into the project construction.</p> <p>In addition to the SCAQMD standard measures to reduce construction emissions, Caltrans Standard Construction Specifications shall be adhered to in order to reduce emissions. The following is a list of Caltrans standard measures provided to reduce the emission of fugitive dust during construction, especially when there are high wind conditions (25mph).</p> <ol style="list-style-type: none"> A. All disturbed areas, including storage piles, that are not being actively utilized for construction purposes shall be effectively stabilized for dust emissions using water, covering, chemical stabilizers/organic/suppressants, or vegetative ground cover. B. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized for dust emissions using water or chemical stabilizers/organic/suppressants. C. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled for fugitive dust emissions by utilizing applications of water or by presoaking. D. When materials are transported off site, all material shall be covered or effectively wetted to limit visible dust emissions, or at least six inches of freeboard space from the top of the container shall be maintained. E. All operations shall limit or expeditiously remove the accumulation of mud or dirt from

	<p>adjacent public streets at least once every 24 hours when operations are occurring. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. The use of blower devices is expressly forbidden.</p> <p>F. Following the addition of materials to or the removal of materials from the surface of outdoor storage piles, said piles shall be effectively stabilized for fugitive dust emissions utilizing sufficient water or chemical stabilizers/organic/suppressants.</p> <p>G. Traffic speeds on unpaved areas shall be limited to 15 mph.</p> <p>H. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than 1 percent.</p> <p>I. Wheel washers for all exiting trucks shall be installed, or all trucks and equipment shall be washed off before leaving the site.</p> <p>J. Wind breaks/fencing shall be installed at windward side(s) of construction areas.</p> <p>K. Excavation and grading activity shall be suspended when winds exceed 32 kph (20 mph).</p> <p>L. Area subject to excavation, grading, and other construction activity shall be limited at any one time.</p> <p>The following measures will be implemented to reduce air pollutants generated by vehicle and equipment exhaust during the project construction phase:</p> <ul style="list-style-type: none"> • The construction contractor shall select the construction equipment used on site based on low emission factors and high energy efficiency. The construction contractor shall ensure that construction grading plans include a statement that all construction equipment will be tuned and maintained in accordance with the manufacturer's specifications. • The construction contractor shall utilize electric or diesel powered equipment in lieu of gasoline powered engines where feasible. • The construction contractor shall ensure that construction grading plans include a statement that work crews will shut off equipment when not in use. • The construction contractor shall time the construction activities so as not to interfere with peak hour traffic and to minimize obstruction of through traffic lanes adjacent to the site; if necessary, a flag person shall be retained to maintain safety adjacent to existing roadways. • The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew.
Noise	<ul style="list-style-type: none"> • Soundwalls shall be constructed according to the recommendations provided in the I-405 Sepulveda Pass Project Noise Study Report and Section 3.14 of the FEIS. • A final decision on the installation of abatement measures will be made upon completion of the design process and the public involvement process. • Where practical, feasible and reasonable, proposed permanent soundwalls shall be constructed at the beginning of the project schedule as a mean of also minimizing construction impacts on sensitive receptors. • Further noise investigation for the houses located east of I-405 between Montana Avenue and Sunset Boulevard will be conducted to determine if they qualify for interior noise abatement because severe traffic noise impacts are identified for which there is no feasible or reasonable solution. • Contractors will be required to use newer equipment with improved noise muffling and ensure that all equipment items have the manufacturers' recommended noise abatement measures, such as mufflers, engine enclosures, and engine vibration isolators intact and operational. Newer equipment will generally be quieter in operation than older equipment. All construction equipment should be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers and shrouding, etc.).

	<ul style="list-style-type: none"> Sealed and lubricated tracks for crawler mounted equipment will lessen the sound radiated from the track assembly resulting from metal to soil and metal to metal contact. Contractors and site engineers and inspectors should ensure that the tracks are kept in excellent condition by periodic maintenance and lubrication. General noise control technology can have substantially quieter construction equipment when manufacturers apply the state of the art technology to new equipment or repair old equipment to maintain original equipment noise levels. Utilize construction methods or equipment that will provide the lowest level of noise and ground vibration impact such as alternative low-noise pile installation methods. Turn off idling equipment. Efficient rerouting of trucks and control of traffic activity on construction site will reduce noise due to vehicle idling, gear shifting and accelerating under load. Rerouting trucks does not reduce noise levels but transfers noise to other areas that are less sensitive to noise. Time scheduling of activities will be implemented to minimize noise impacts on exposed areas. Local activity patters and surrounding land uses must be considered in establishing site curfews. However, limiting working hours can decrease productivity. Sequencing the use of equipment with relatively low noise levels versus equipment with relatively high noise levels during noise sensitive periods is an effective noise control measure. Equipment location should be as far from noise sensitive land use areas as possible. The contractor should substitute quieter equipment or use quieter construction processes at or near noise sensitive areas. Inspect and remove trucks with faulty and/or modified muffler systems. Require the construction contractor to address temporary impacts by: <ul style="list-style-type: none"> Utilizing construction methods or equipment that would provide the lowest level of noise impact. Schedule construction such that the absolute minimum number of pieces of equipment would be operating within the same vicinity simultaneously to reduce the number of concurrent noise sources. Schedule the duration and timing of construction activities to minimize noise impacts on exposed individuals. Keep area residents and businesses informed of the schedule, duration, and progress of the construction to minimize public objections of unavoidable noise. Notify communities in advance of construction and of the expected temporary noise impacts during the construction period.
Biological Resources	<p>Wetlands</p> <ul style="list-style-type: none"> As the design of the project is finalized and the extent of the widening is precisely defined, studies to determine impacts to jurisdictional drainage areas will be conducted. Although sensitive wildlife species were not identified during the surveys to date, additional follow-up surveys are recommended, prior to construction, to evaluate new project information that becomes available through project development, as well as any new biological information that becomes available as a result of other studies. The following permits will be required prior to construction: Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers for anticipated impacts to Waters of the U.S.; a Clean Water Act Section 401 Water Quality Certification from the Los Angeles Regional Water Quality Control Board for anticipated impacts to Waters of the U.S.; and a Streambed Alteration Agreement under Section 1600 of the California Department of Fish and Game Code for the drainage modifications in the project area. <p>Vegetation Walnut Trees Removal of walnut trees will be avoided to the greatest extent possible. However, should it be necessary to remove walnut trees for the construction of the project, the number of trees removed (currently estimated at 43) will be minimized to the least amount necessary.</p>

Coast Live Oak Trees

Removal of Coast Live Oak Trees will be avoided to the greatest extent possible. However, should it be necessary to remove oak trees for the construction of the project, the number of trees removed (currently estimated to be 41) will be minimized to the least amount necessary.

Sycamore Riparian Woodland

Removal of sycamores will be avoided to the greatest extent possible. However, should it be necessary to remove sycamore trees for the construction of the project, the number of trees removed (currently estimated to be 12) will be minimized to the least amount necessary.

Walnuts, oaks and sycamore trees will be replaced at a 5:1 ratio. Favorable areas within the right of way to be selected by the District Biologist and the District Landscape Architect. Any required replacement beyond the space available in the right of way will be done off-site, in coordination with the Santa Monica Mountains Conservancy, which owns open-space land adjacent to the project.

Native Tree Replacement

Naturally existing native trees that have a 4-inch diameter at a height of 4.5 feet above grade (4-inch diameter at breast height) will be replaced at a 5:1 ratio. Tree replacement will be coordinated between the District Landscape Architect and District Biologist and incorporated into the plans. This native tree replacement ratio is limited to naturally occurring trees affected by the project, such as those that exist through the Sepulveda Pass. Native trees, which have been planted as a component of the freeway landscaping, particularly in the southern half of the project, will be replaced in accordance with District Landscape architecture policies.

Invasive Species Control Measures

Revegetation of upland areas will incorporate appropriate native plant species found within the Santa Monica Mountains. The District Biologist and the District Landscape Architect to coordinate to create an acceptable plant pallet that will prevent the spread or reintroduction of invasive plant species.

Plant species with aggressive growth habits, such as the Ice Plant, will be planted where appropriate in contained urban areas, not adjacent to natural open space or wildlands.

Plant Survey Requirements

Plant surveys will be required for the following plants species: Braunter's Milk-vetch, Davidson's Bush Mallow and Mesa Horkelia. Although, these species are not anticipated to occur in the relatively disturbed footprint of the project area, in order to avoid any potential impacts to these species, additional surveys will be conducted prior to construction.

Caltrans will work with the Bel Air Crest community in developing the replacement planting, irrigation system and lighting for all affected areas in the immediate vicinity.

Any existing landscaping outside state right-of-way that is affected by construction activities will be replaced in-kind.

Wildlife Crossing Mitigation

Sepulveda Blvd. Underpass and I-405 (at the Getty View Trailhead)

Because of project impacts to wildlife movement, the following mitigation measures are recommended to minimize the impact of the new on-ramp:

- An appropriately-sized culvert will be created underneath the proposed on-ramp to funnel wildlife from the underpass area to the more natural areas of Sepulveda Ridge. It is proposed to put the new culvert near the existing trailhead parking area due to geometrics of the new on-ramp as well as existing wildlife movement patterns.

- The Santa Monica Mountains Conservancy and Caltrans will collaborate to create the design of the culvert so that existing wildlife that roams in this area will be able to successfully reach habitat on either side of the new on-ramp.
- The abutment slope of the Sepulveda Blvd. overcrossing will be re-graded to maximize the potential for wildlife to cross it.
- Re-plant new and existing Caltrans areas for use as “stepping stones” for wildlife. Some of these areas are the southbound off-ramp gore area, abutment slope of the Sepulveda Blvd. overcrossing down to the wildlife culvert, and the southbound off-ramp and on-ramp right-of-way areas. Appropriate native vegetation will include a mixture of trees, shrubs and ground cover. The density will be appropriate for wildlife to maneuver in, but not too dense or too sparse to discourage use by wildlife. The Landscape Architecture department and the Division of Environmental Planning (in coordination with the Santa Monica Mountains Conservancy) will work together to create the appropriate re-vegetation plan suitable for the area.
- The right-of-way fence under I-405 at the Sepulveda Blvd. overcrossing will be removed so that wildlife can cross Sepulveda at this location without restriction. It is also recommended to move or even remove additional fencing at the on- and off-ramps on both the northbound and southbound sides if deemed feasible by Caltrans to funnel the wildlife onto the stepping stones and eventually to the wildlife culvert under the new on-ramp. Consultation with the SMMC on the exact location of these fence modifications shall take place during the later design phase of the project.
- Appropriate signs shall be placed along Sepulveda Blvd. to warn motorists of the potential for wildlife to cross the roadway in that area. There shall be a warning sign on the northbound and southbound sides of Sepulveda Blvd. Consultation with the City of Los Angeles Department of Transportation will be necessary to erect this sign.
- All new street lights to be installed will be in coordination with the City of Los Angeles Bureau of Street Lighting and in accordance with the lighting specifications using the lowest level of illumination/brightness to meet safety needs while minimizing glare. The lights will be equipped with shields to direct light and minimize spill-over and will use metal halide lamps for better color rendering.

Bel Air Crest Underpass

- The re-grading of the abutment slopes will be done in a manner that is consistent with the existing slopes.
- The vegetation planted on the new abutment slopes shall consist of native species in a varied assortment of trees, shrubs and ground cover.
- Right-of-way fencing shall be placed in a manner that is not restrictive for wildlife to access natural areas adjacent to Caltrans property, wherever feasible.
- The profile of the access road will be lowered in order to maintain and preserve the slope where existing wildlife access trails from the underpass that lead to natural areas to the north and south.

Skirball Center Drive Overpass

Modifications to the Skirball Center Drive overpass would affect the existing trailhead for the Sepulveda Trail. The trailhead is currently located just east of the overpass next to the existing pedestrian crosswalk. The following mitigation measures are proposed:

- Caltrans right-of-way fencing will be removed along the northbound side of Sepulveda Blvd. from approximately 70 feet south of the intersection of Sepulveda Blvd. and Skirball Center Drive.
- The island area south of Skirball Center Drive, east of Sepulveda and west of I-405 will be replanted with native vegetation in a mixture of ground cover, shrubs and possibly trees that is preferable for wildlife habitat. All concrete from the existing on-ramp will be removed. This island will serve as a stepping stone area. A perimeter fence should be

constructed to funnel the wildlife to the overpass. To help the funnel effect, the fencing shall be placed directing wildlife toward the bridge structure. Caltrans will continue to consult with the Santa Monica Mountains Conservancy during the later design stages of the project to finalize optimal plans for this funneling effect.

- The new overpass will include a minimum 10-foot wide travel path on the south side of the bridge to accommodate wildlife movement. This path will function as a wildlife conduit (nighttime hours) as well as a pedestrian sidewalk. The south side of the path will have a minimum 5-foot high continuous, solid wall. This wall will extend beyond any travel lanes (including ramps) so that wildlife views are blocked to the freeway traffic below. The north side of the travel path will have a continuous 3-foot high concrete wall/curb extending from a point 20 feet east of the Sepulveda northbound street lane to the eastern end of the bridge structure.
- The 3-foot high concrete wall will continue on the eastern side of the overpass for potentially 100 feet northward to prevent wildlife from crossing Skirball Center Drive and instead directing them towards the overcrossing. In addition, the fencing between the bridge and the trailhead area shall be placed in a manner naturally directing wildlife to the Sepulveda Trail area from the bridge, and vice versa.
- All new street lights to be installed will be in coordination with the City of Los Angeles Bureau of Street Lighting and in accordance with the lighting specifications using the lowest level of illumination/brightness to meet safety needs while minimizing glare. The lights will be equipped with shields to direct light and minimize spill-over and will use metal halide lamps for better color rendering.
- The existing trailhead slope will be re-graded and filled to accommodate the widening of the bridge structure and freeway. In addition, during construction, lighting will be kept to a minimum during the night so as not to impede wildlife.
- During construction, lighting will be kept to a minimum during the night so as not to impede wildlife.
- Possible improvements to fencing to limit wildlife access to the highway will be considered during final design.
- A monitoring plan (prior to and during construction) and success criteria (post-construction) of the proposed mitigation measures will be established in conjunction with the Los Angeles Department of Transportation.

Caltrans will maintain and protect wildlife crossings identified by the Santa Monica Mountains Conservancy within the project limits.

Caltrans will work with the City of Los Angeles, the Santa Monica Mountains Conservancy and other interested parties to secure multi-agency funding for a wildlife crossing under or over Sepulveda Blvd., south of Skirball Center Dr.

Additional Measures to Minimize Harm:

Pre-Construction surveys

Biological surveys of the project area will be performed in locations having increased biological sensitivity as determined by the District Biologist. General wildlife surveys will be conducted at least two weeks prior to the clearing and grubbing of vegetation.

Caltrans will continue to coordinate with the National Park service to develop a wildlife movement monitoring/data collection plan before, during and after construction.

Nesting Bird Surveys, Swallow Exclusion

In compliance with the Federal Migratory Bird Treaty Act and California Department of Fish and Game Code 3505 and 3503.5, for those project areas where nesting birds may occur, Caltrans will attempt to remove nesting habitat between September 1st and January 31st to avoid the active nesting bird season. If avoidance is not possible, a qualified biologist shall survey all potential nesting habitat within the entire project impact area. If an active bird nest is located,

	<p>the nest site shall be flagged or staked a minimum of 15 feet, 500 feet for raptors, in all directions. This flagged zone shall not be disturbed until the nest becomes inactive, unless otherwise directed by the California Department of Fish and Game. Bridges will also be surveyed for nesting birds, and exclusionary measures will be implemented to prevent nesting during construction activities.</p> <p><u>Construction Monitoring</u> A monitoring plan will be developed once the construction schedule is known in order to appropriately monitor biological resources.</p>
--	---

Mitigation Monitoring

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the selected alternative in accordance with 23 CFR 635.309(j). The MMRP identifies responsible parties and provides guidelines for implementation and reporting for all mitigation measures described in Chapter 3 of the FEIS. The MMRP is located in Chapter 6 of the FEIS.

Caltrans will be responsible for implementing and reporting the status of the mitigation measures in the MMRP. Caltrans will also be responsible for construction management and oversight, and assuring that mitigation measures are fully implemented by designated and qualified personnel, which may include specialty contractors.

All mitigation monitoring reporting forms will be completed by those responsible for implementation, and verified by those responsible for monitoring and approval. Duplicate copies of certified forms will also be retained in the State archives with the 'as-built' drawings for this project.

Comments on the FEIS:

The FEIS was circulated for comment beginning March 14, 2008 and ending on April 14, 2008. Comments were accepted and included as of April 18, 2008. Letters commenting only on the CEQA FEIR are not included.

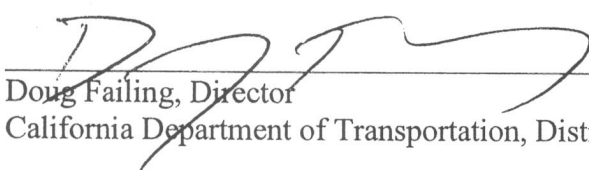
Those who provided comments were:

- The United States Environmental Protection Agency, April 14, 2008
- The United States General Services Administration, April 16, 2008
- The Santa Monica Mountains Conservancy, March 24, 2008
- Westwood Hills Property Owners Association, April 9, 2008
- Kim and Dominic Sandifer, April 10, 2008
- Kevin and Lisa Cook, April 14, 2008
- Chet R. Bhavsar, April 14, 2008

Their comments and responses are contained in Attachment 1 Comments Received on the I-405 Sepulveda Pass Widening Project of this ROD.

Record of Decision of Approval:

The Addition of a Standard Northbound HOV Lane and Standardization of Northbound Mixed-Flow Lanes, Median and Shoulder (Alternative 2) has been determined to best provide a safe and efficient transportation facility and to be the environmentally preferable alternative. This selection was based on minimizing right-of-way environmental impacts, engineering and operational advantages, and public and agency comments received during the environmental process. All practical measures to minimize harm have been adopted and will be incorporated into this decision. The Record of Decision for the Widen Interstate 405 (San Diego Freeway) from Interstate 10 to US-101 project is hereby approved.



Doug Failing, Director
California Department of Transportation, District 7

4/25/08

Date

Attachment 1

Comments Received on the I-405 Sepulveda Pass Widening Project Final Environmental Impact Statement



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

April 14, 2008

Mr. Ron Kosinski
California Department of Transportation
100 South Main Street
Los Angeles, California 90012-3606

Subject: Final Environmental Impact Statement for the Interstate 405 Sepulveda Pass
Widening Project, from Interstate 10 to U.S. 101, Los Angeles County, California
(CEQ #20080081)

Dear Mr. Kosinski:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Interstate 405 (I-405) Sepulveda Pass Widening Project, from Interstate 10 (I-10) to U.S. 101, Los Angeles County, California. Our comments are provided under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.


EPA reviewed the Draft Environmental Impact Statement (DEIS), and provided comments to the Federal Highway Administration (FHWA) on September 20, 2007. We rated the DEIS as Environmental Concerns-Insufficient Information (EC-2) due to concerns that the DEIS may not have accurately disclosed additional impacts from project revisions that occurred after the publishing of the original DEIS. EPA also expressed concerns about increased impervious surfaces and construction emissions and runoff. In addition, EPA recommended that the discussion on dispersion modeling and exposure and health effects for mobile source air toxics be updated to reflect the findings of recent studies and reports.

While some of our concerns have been resolved, we remain concerned about the water quality and air quality impacts of the project as presented in the Final EIS (FEIS). EPA continues to recommend that Caltrans (1) provide additional information regarding the placement, selection, and performance standards of the Best Management Practices (BMPs) in the Record of Decision (ROD) to support the conclusion that the project will not cause or contribute to further impairment of downstream waterbodies, and (2) consider additional noise and air quality impacts to the Salvation Army Westwood Transitional Village outdoor toddler play area that would be adjacent to the proposed northbound I-405 Wilshire off-ramp. We also recommend that Caltrans' commitment to incorporate EPA's recommended construction mitigation measures as discussed in page 401 of the FEIS Response to Comments to Agencies be included in the ROD. We further recommend that Caltrans update the information presented on mobile source air toxics.

Printed on Recycled Paper

We appreciate the opportunity to review this FEIS. When the ROD is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact Connell Dunning, Transportation Team Lead, at 415-941-4161, or Susan Sturges, the lead reviewer for this project. You may reach Susan at 415-947-4188 or sturges.susan@epa.gov.

Sincerely,

For 
Nova Blazej, Manager
Environmental Review Office

Attachments:
EPA's Detailed Comments

cc: Carlos Montez, California Department of Transportation
Steve Healow, Federal Highway Administration
Paul Edelman, Santa Monica Mountains Conservancy
Mark Cohen, U.S. Army Corps of Engineers

EPA DETAILED COMMENTS ON THE INTERSTATE 405 SEPULVEDA PASS WIDENING PROJECT,
FROM INTERSTATE 10 to US 101, LOS ANGELES COUNTY, CALIFORNIA, April 14, 2008

Water Quality

Although the Final Environmental Impact Statement (FEIS) mentions that a Construction Storm Water Pollution Prevention Plan (SWPPP) would be prepared prior to starting construction activities, very little information is contained in the document to support the conclusion that, "The proposed project would not further impair the 303(d) listed water bodies" (Section 3.10.3). Section 3.10.4 mentions that a Storm Water Data Report was completed for the project that includes treatment Best Management Practices (BMP)s to prevent sediment and other pollutants from entering the storm drain system. Although Figure 3.10-1 contains a few proposed Storm Water Treatment locations, it is unclear how these BMPs will meet water quality criteria for the downstream waterbodies. EPA continues to recommend the following:

- Provide more information in the Record of Decision (ROD) to support the conclusion that the project will not cause or contribute to further impairment of downstream waterbodies.
- Include storm water performance standards for both construction site sediment control and post-construction project design standards in the ROD.
- Provide more information in the ROD regarding the placement, selection, and performance of the BMPs mentioned in Section 3.10.4 (Avoidance, Minimization and Mitigation Measures) of the FEIS.
- Design, install, and maintain BMPs to control total suspended solids (TSS) carried in runoff post-construction of the project.
- Employ BMPs to maintain or reduce the peak runoff discharge rates, to the maximum extent practicable, as compared to the pre-development conditions for the 2-year, 24-hour design storm event.
- Design, install, and maintain BMPs to infiltrate sufficient runoff volume such that post-development infiltration volume should be at least 90 percent of the predevelopment infiltration volume. That is, no more than 10-percent decrease in infiltration would be allowed.

1

Air Quality

Construction Mitigation Measures

The FEIS Response to Comments acknowledges that Caltrans will require the contractor to adhere to the construction mitigation measures recommended below by EPA. EPA recommends that this commitment and the measures below be captured in the ROD.

2

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.

- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

2

Mobile and Stationary Source Controls:

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturers recommendations
- If practicable, lease newer and cleaner equipment meeting the most stringent of applicable Federal or State Standards (see table: <http://arb.ca.gov/msprog/ordiesel/documents/Off-Road%20Diesel%20Stds.xls>). In general, only Tier 2 or newer engines should be employed in the construction phase, given the scale of the construction project and the high background levels of pollutants in the area.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

3

Administrative controls:

- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintain traffic flow.

4

- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors away from fresh air intakes to buildings and air conditioners.

4

Air Toxics

Dispersion Modeling

The discussion of limitations in the dispersion models in the FEIS has been updated from previous information presented in the February 2006 FHWA MSAT interim guidance, but still does not reflect current available science. While the CALINE and CAL3QHC were developed and validated a number of years ago, as stated in the FEIS, they continue to undergo validation. A number of recent studies have determined that CALINE, especially CALINE4, accurately predicts ambient concentrations in near-roadway environments for both gaseous and particulate pollutants (see, for example, Gramatnev *et al.*, Atmospheric Environment, volume 37, pages 465-474, 2003; Zhang *et al.*, Atmospheric Environment, volume 39, pages 4155-4166, 2005). The joint University of California Davis - Caltrans report, entitled "A Survey of Air Quality Dispersion Models for Project-Level Conformity Analysis" (June 19, 2006), concluded that available models are appropriate for modeling project-level dispersion of on-road and construction emissions, contradicting the language in the FEIS.

In the near-roadway environment, the major mobile source air toxics (MSATs) will behave similarly to carbon monoxide: both are treated as inert gases for the purposes of dispersion. In fact, one of the most reactive MSATs, formaldehyde, has an atmospheric half-life very similar to carbon monoxide: 4-10 hours for formaldehyde compared to 4-6 hours for carbon monoxide under typical conditions. Since the majority of impacts are expected to occur within 1000 feet of the roadway or closer (for a summary of supporting studies, see Section 3.1.3 of EPA's "Draft Regulatory Impact Analysis: Control of Hazardous Air Pollutants from Mobile Sources," February 2006, <http://www.epa.gov/oms/regs/toxics/ria-sections.htm>), pollutants are dispersed within a few minutes under average wind speeds. Neither MSATs nor carbon monoxide undergo significant reactions in a few minutes, and thus both can be accurately treated as inert gases for the purposes of dispersion, as is standard practice for carbon monoxide.

5

Based on these recent studies and reports, CALINE4 would be an appropriate tool for dispersion analysis of MSATs, if desired. The March 2007 report, entitled "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process" ([http://www.trb.org/NotesDocs/25-25\(18\)_FR.pdf](http://www.trb.org/NotesDocs/25-25(18)_FR.pdf)), prepared for the American Association of State Highway and Transportation Officials (AASHTO), identifies CALINE4 as the "Best Available Air Quality Modeling Tool for use in Analyzing MSATs under NEPA" for purposes of both roadway widening and high occupancy vehicle (HOV) lane addition.

Furthermore, the discussion in the FEIS references a lack of adequate monitoring data as a limitation. While air toxics monitoring data is frequently limited, Southern California is one of the most studied areas of the country. There are numerous sources of both monitored and modeled ambient air toxics concentrations in Southern California, including several fixed site air

toxics monitors operated by South Coast Air Quality Management District (SCAQMD) and California Air Resources Board, EPA's National Air Toxics Assessment (NATA, <http://www.epa.gov/ttn/atw/nata1999/>), and SCAQMD's Multiple Air Toxics Exposure Study (MATES, <http://www.aqmd.gov/matesiidf/matestoc.htm> and <http://www.aqmd.gov/prdas/matesIII/matesIII.html>). Thus it would be straightforward to determine MSAT background concentrations, providing context for any potential dispersion analysis.

Recommendation:

EPA continues to recommend the following updates regarding information provided in the MSATs Section be included in the ROD:

- Update the language on "Information that is Unavailable or Incomplete," beginning on page 200, as noted above.
- Revise the discussion of uncertainties in "Dispersion" to include an updated discussion of the use of CALINE4 in situations similar to the proposed project, referencing more recent studies and the report prepared for AASHTO.
- Revise the discussion to more accurately reflect dispersion of MSATs and carbon monoxide. Specifically, the ROD should remove implications that dispersion of MSATs would differ from dispersion of carbon monoxide.

EPA also recommends that the concern about establishing project-specific MSAT background concentrations be amended to note that Caltrans could work with EPA and SCAQMD to determine relevant background concentrations. EPA is not recommending that Caltrans perform a dispersion analysis of air toxics. We do, however, acknowledge that this analysis is possible.

Exposure Levels and Health Effects

Both EPA and California Office of Environmental Health Hazard Assessment (OEHHA) have long standing experience and published, peer-reviewed guidance for evaluating long-term health effects, including cancer risk. The concerns raised about estimating exposure over a 70-year lifetime have been addressed extensively by our agencies. Recently, EPA has published an Air Toxics Risk Assessment Reference Library (http://www.epa.gov/ttn/fera/risk_atra_main.html) that addresses the precise concerns raised in this section of the FEIS - namely how to develop appropriate exposure scenarios in a risk assessment. Similarly, California OEHHA has hot spot risk assessment guidance published in support of California's Air Toxics "Hot Spots" Information and Assessment Act of 1987 (a.k.a. AB2588, http://www.oehha.ca.gov/air/hot_spots/pdf/HRAguidefinal.pdf). While we agree with the statement in the FEIS that there are always uncertainties associated with risk assessments, for this project most uncertainties would be consistent across alternatives, and thus such an analysis would still be sufficient for distinguishing between the impacts among scenarios and informing mitigation.

Recommendation:

The ROD should include a revision of the discussion of uncertainties in "Exposure Levels and Health Effects" to include a discussion of possible exposure scenarios typically used by EPA and California OEHHA in air toxics risk assessments. EPA is not recommending that Caltrans perform a human health risk assessment. We do, however, acknowledge that such an assessment is possible.

6

Environmental Justice

Census tract 7011 in the project area contains the Salvation Army Westwood Transitional Village, which provides transitional housing for homeless families and veteran families with long term supportive needs. EPA commends Caltrans for meeting with the Salvation Army Westwood Transitional Village, including the Bessie Pregerson Child Development Center, to identify their concerns with the project; however, EPA continues to recommend that Caltrans further minimize potential impacts of the project:

7

- To compensate for additional noise and air quality impacts to the Salvation Army Westwood Transitional Village outdoor toddler play area that would be adjacent to the proposed northbound I-405 Wilshire off-ramp, assess options to relocate the outdoor play area further away from these near-roadway impacts and include these options in the ROD. Identify in the ROD what additional measures will be implemented to further reduce impacts.

Response to Comments from U.S. EPA

- 1) *Water Quality* – The I-405 Stormwater Quality Master Plan can be forwarded to U.S. EPA which provides detailed hydrological analysis in support of the proposition identified in Section 3.10.3 of the FEIS. Caltrans engineering calculations indicate that total Added WQV Water Quality Volume (WQV) for impervious area within Caltrans Right-of-Way = 99,000 ft³. There are 13 various permanent treatment Best Management Practices (BMPs) to be implemented for the project with a combined Treatment WQV of 288,000 ft³. The proposed BMPs will treat more WQV than what is generated by the additional impervious area within Caltrans Right-of-Way (R/W).

The Caltrans National Pollutant Discharge Elimination System (NPDES) Permit 99-06-DWQ and The California General Construction permits clearly state that the performance standard for construction site controls are Best Available Technology Economically Achievable/Best Conventional Technology (BAT/BCT). It is not feasible to establish numeric effluent limits, which is in compliance with the NPDES permit and Section 402 of the Clean Water Act, and general EPA policy and guidance for construction site BMPs. The construction site BMPs are part of the Storm Water Pollution Prevention Plan, which is prepared by the contractor prior to the start of construction. Post Construction BMPs are implemented in accordance with the Caltrans NPDES permit, Storm Water Management Plan (SWMP), and Project Planning and Design Guide (PPDG) to the Maximum Extent Practicable. The Caltrans Construction Site Manual lists the temporary BMPs used on Caltrans projects. The plan sheets, standard specifications, and standard special provisions of this project describe how those BMPs shall be installed and the quantities estimated for construction.

Please reference the EPA/ASCE website for additional studies on BMP performance and implementation to cross-reference the Caltrans manuals at: <http://cfpub.epa.gov/npdes/stormwater/const.cfm>

Post-construction design standards for sediment control, which Caltrans refers to as Design Pollution Prevention BMPs, will be implemented to:

- a) Minimize impervious surfaces, thereby reducing the volume of runoff;
- b) Prevent downstream erosion through use of hydraulic features such as flow spreaders and channel protection (if needed), in order to avoid causing downstream erosion.
- c) Maximize vegetated surfaces, to prevent erosion, promote infiltration (which reduces runoff), and remove pollutants from stormwater; and
- d) Disturbed soil areas which will not receive a vegetated cover will be appropriately stabilized to prevent erosion.

Caltrans Design followed the Project Planning and Design Guidance (PPDG) to select the appropriate BMPs to install to the maximum extent practicable for the new impervious areas. Caltrans has conducted extensive studies to document the effectiveness of the approved treatment BMPs.

The Targeted Design Constituents (TDC) approach outlined in the PPDG was referenced to determine the prioritization for the potential BMPs. Implementation of Design Pollution Prevention (DDP) BMPs and source control were also considered and will be implemented in accordance with the guidelines.

Construction BMPs will be developed by the Design-Build Contractor, and will be described in their Construction Storm Water Pollution Prevention Plan (SWPPP). The guiding document will be the State Water Resources Control Board (SWRCB) General Construction Permit (1999, or the latest, if updated).

The Targeted Design Constituents (TDC) method outlined in the PPDG prioritizes the implementation of BMPs as follows:

- Infiltration Devices
- Media Filters
- Wet Basins
- Detention Devices
- Biofiltration Strips
- MCTT
- Biofiltration Swales

The Project will implement the following BMPs:

- 3 Infiltration Basins
- 6 Media Filters
- 4 Bioswales

Most of the BMPs included in the project are also included on the upper end of the TDC priority list. Additionally the Caltrans pollution prevention BMPs included in the design will control sediment and Total Suspended Solids (TSS) by preventing erosion from occurring and therefore reducing the need for additional treatment by controlling the pollutant at the source. This is the most effective strategy to control TSS within a watershed for point sources and also non-point sources. The Caltrans Storm Water Management Plan (SWMP) and maintenance guidance describe how Caltrans maintains BMPs.

The reference of a 2-year, 24-hour storm is being considered for some MS4 permits, but at this time, is not in the Caltrans permit. Drainage of highways, for purposes of maintaining public safety, is based on peak intensity, duration of the rainfall, and frequency (or recurrence interval); a comparison to the total rainfall in a 24-hour event is not usually made. Water quality design standards imposed upon Caltrans by the SWRCB include the following hydrologic requirements: in the project location the Regional Water Quality Control Board (RWQCB) stipulates 0.75 inches for a water quality design event for volume-based Treatment BMPs; also as stipulated by the RWQCB as the water quality design event for flow-based Treatment BMPs is an intensity of 0.20 inches/hour. Total runoff from the project during this design event would be reduced at locations where the Treatment BMPs will be placed.

There is no regulation requiring 90% of the pre-development infiltration volume be infiltrated as this is an arbitrary value and not directly linked to an impact to a beneficial use within the watershed. Please reference the EPA National Management Measures of the Control of Hydromodification effects and management strategies.

Caltrans has considered, evaluated, and is in the process of designing the three infiltration basins within the project limits to the maximum extent practicable. Currently there are no infiltration devices within the project limits. Three infiltration basins are proposed to be constructed with a combined treatment capacity WQV of 87,000 ft³. Infiltration basins by design capture the entire water quality volume. Additionally, six media filters and four bio-swales are being considered for design at this time. Both are shown to reduce the effects of stormwater runoff by increasing attenuation of peak flows and increasing infiltration through vegetation of the soils.

- 2) *Fugitive Dust* – Caltrans reaffirms the commitment to the mitigation in the Final EIS and in this Record of Decision (ROD). These measures will be included in dust control plans required at the construction stage of a major project under SCAQMD Rule 403. Differences between the measures identified in the Final EIS and ROD and EPA's list have been minimized.

Stabilizing piles will be required under Standard Specs Section 10. Wind fencing will be required for storm water pollution control, and hauling parameters will be included in the SWPPP and implemented to reduce trackout and neighborhood effects.

- 3) *Mobile and Stationary Source Controls* - Commute trip reduction, diesel idling, maintenance/inspection of diesel equipment, and public fleet rules are all covered under Standard Specifications Rule 7-1.01F as applicable regulations.

Noise mitigation list also identifies some of these air quality construction control measures.

- 4) *Administrative Controls* – The commitment to implement Best Available Control Measures is contained in Chapter 6 – Environmental Commitments Record (page 1108-1109) of the Final EIS.

ARB regulations already require that all off-road diesel fuel sold for use in California must meet the same standards (including sulfur content) as on-road fuel. The standards include the 15ppm sulfur limit which is consistent with Standard Specifications 7-1.01F.

Alternative fuel engines for sweepers is required under AQMD and ARB regulations.

A construction Traffic Management Plan (TMP) will minimize traffic interference to maintain traffic flow and reduce major congestion. The TMP includes an incentive program for use of alternative transportation during the construction period. Sensitive receptors are considered as part of the freeway design process. A construction staging plan will also be prepared to minimize impacts to sensitive receptors.

- 5) *Dispersion Modeling* – The MSAT analysis contained in the Air Quality Assessment and Final EIS is consistent with the Federal Highway Administration’s guidance, “*Interim Guidance on Air Toxics Analysis in NEPA Documents.*” FHWA does not believe that dispersion modeling is appropriate at this time. Caltrans is in agreement, particularly on the HOV project. The completed analysis provides sufficient information for decision-makers and the public regarding potential impacts of MSATs. The studies referenced do not “validate” CALINE4 for MSAT dispersion analysis, they only suggest that the model would not be completely unsuitable and, arguably, would be better than some of the alternatives (i.e. an improvement but not reliable with any reasonable degree of certainty).

EPA's recommendation to use CO dispersion modeling for MSAT has not been fully tested in the referenced studies. As discussed in the FHWA’s interim guidance, FHWA has initiated a pooled fund study with five state DOTs (AZ, KS, MI, NV, NY) to study behavior of MSATs from major highways. This pooled fund study will yield knowledge about MSAT emissions and give us credibility when addressing related issues for projects in the study areas. There is no guarantee the study will enable us to accurately model the dispersion of MSATs from major highways. Until these studies are completed, FHWA’s position regarding dispersion modeling, based on literature review and EPA guidance on air quality models, remain the same. FHWA and Caltrans have not changed our position about dispersion modeling as stated in the Interim Guidance.

Caltrans will continue to work with EPA and SCAQMD to determine relevant background concentrations. EPA is not recommending that Caltrans perform a dispersion analysis of air toxics.

- 6) *Exposure Levels and Health Effects* – The HOV portion of this project is a transportation control measure from the approved SIP and an operational strategy that, by its nature, should contribute to improving regional air quality. The primary purpose of the project is to reduce congestion and higher emissions are associated with congested traffic speeds. This project is expected to improve overall air quality and would not cause or contribute to a violation of the National Ambient Air Quality Standards. Caltrans Air Quality Specialists use and appreciate the EPA Air Toxics publications.
- 7) *Environmental Justice* - There is a recent study indicating that high sound walls may reduce near-field concentrations of particulate matter (including diesel particulate matter). There is a 12’ soundwall proposed at the Salvation Army Westwood Transitional Village outdoor toddler play area. A higher wall, on the order of 16’ is being considered for this site. The air quality improvement would be difficult to quantify using current models. The study on this issue used a dispersion model that is not commonly used for transportation facilities.



GSA Pacific Rim Region

April 16, 2008

VIA FACSIMILE AND ELECTRONIC:MAIL

Mr. Ronald Kosinski
Deputy Director for Environmental Planning
District 7
Department of Transportation
100 South Main Street
Los Angeles, CA 90012

William A. Evans, Esq.
Legal Division
District 7
Department of Transportation
100 South Main Street
Los Angeles, CA 90012

RE: GSA's Comments on the Interstate 405 Sepulveda Pass Project Final
Environmental Impact Report / Environmental Impact Statement (FEIR /
FEIS) and Section 4(f) Evaluation, in Los Angeles County, California.

Dear Sirs:

The purpose of this letter is to bring to your attention the following issues about the Environmental Impact Statement for the Interstate 405, Sepulveda Pass Widening Project published on January 2008. The proposed action consists of an elevated "fly-over" off-ramp from the north bound I-405 Freeway at Wilshire Boulevard that would cut directly cross the northwest corner of the federal property located at 11000 Wilshire Boulevard, Los Angeles, California ("11000 Wilshire"). The "fly-over" would be anchored to the ground by multiple columns to be located on Federal property, which Caltrans has not yet acquired. The United States of America, acting by and through the General Services Administration (GSA), is the owner and property manager of 11000 Wilshire.

As the owner of 11000 Wilshire, we have serious concerns about the impact of the proposed action on our property. GSA's October 23, 2007 letter from Peter Stamison, GSA Regional Administrator, to Will Kempton, Director of Caltrans, sets forth the "fly-over's" adverse impacts on the public, building, site, as well as the security and mission of the multiple agencies located at 11000 Wilshire. The "fly-over" option, as currently proposed by Caltrans,

Page 1 of 6

U.S. General Services Administration
450 Golden Gate Avenue
San Francisco, CA 94102-3434
www.gsa.gov

poses significant challenges to the access and maneuverability of large delivery trucks destined for the loading docks at the Federal Building and US Post Office facility at 11000 Wilshire. The "fly-over" option also increases the security threat by bringing vehicles to a 25' height over ground level and closer to the FBI and other Federal tenants as well as the fuel storage tanks located on the site.

I understand that GSA and Caltrans met on April 9, 2008, at which time Caltrans presented its most recent revised proposal and overlay drawings for realignment of the I-405 interchange at Wilshire Boulevard. This meeting produced positive results for all parties, as Caltrans' latest proposal appears to address many of the concerns previously raised by GSA. GSA is encouraged that the recent meeting resulted in an agreement between GSA and Caltrans to continue to work together to achieve workable solutions on a number of open issues through a series of pre-design meetings over the next several weeks.

We would like to take this opportunity to comment on the Final EIS and our ongoing concerns about the proposed project.

INADEQUATE NOTICE TO GSA AND OPPORTUNITY FOR GSA'S PARTICIPATION

GSA was first informed that Caltrans was in the process of preparing a Draft Environmental Impact Statement (DEIS) on the proposed Sepulveda Pass Project by Ms. Dawn Kukla, Environmental Planner at Caltrans, on February 22, 2007. In this email message, Ms. Kukla stated: *"We are not sure if you are aware of our project, but it has been in the planning stages for many years and we are nearly ready to release our EIS/EIR for public circulation in March."*

We have since learned that Caltrans held its first Public Scoping Meeting on January 16, 2002, an "agency meeting" on January 16, 2002 at the Veterans Administration Brentwood Theater and then another Public Scoping Meeting on October 18, 2005. GSA never received notification of any of these meetings as required under NEPA. Nor did we ever receive copies of the notice of intent to prepare an environmental impact statement. We also did not receive a copy of the notice of availability of the Draft EIS published on June 1, 2007 as required by 40 CFR 1506.6. Caltrans failure to provide to GSA the June 1, 2007 notice is even more surprising since by that time Caltrans had already met with GSA and was aware of our serious concerns of the impact on 11000 Wilshire.

LACK OF PUBLIC DISCLOSURE OF PROJECT DETAILS

As noted above, GSA never received a timely copy of the notice of intent, notice of the public scoping meetings, notice of availability of the Draft EIS. Instead, GSA took the initiative by writing on April 4, 2007 to Ron Kosinski, Caltrans Deputy Director, requesting a meeting on the proposed project during the week of April 16 – 20, 2007. The scheduled meeting was subsequently cancelled by Caltrans and did not occur until May 10, 2007. At this meeting, GSA explained that GSA could not begin conferring with the Federal tenants to determine how they would be impacted by the proposed action until Caltrans provided critical information about the project. Following the meeting, GSA again wrote to Caltrans because

Caltrans had still not provided the information requested. GSA's July 10, 2007 letter set forth a detailed list of questions about the project. Once Caltrans responded, GSA began meeting with the Federal tenants of 11000 Wilshire in late August 2007. In fact, during the time period from April to late August 2007, there were other meetings between Caltrans and GSA in order for GSA aimed at obtaining information about the project necessary for GSA to determine the potentially significant impacts on 11000 Wilshire.

The lack of detailed project information prevented GSA from making timely and informed comment on the Draft EIS. At the meeting on May 10, 2007, GSA explained to Caltrans that GSA would not be able to submit comments to the Draft EIS by the requested deadline since Caltrans had not yet provided critical information to GSA. GSA expeditiously worked with the Federal tenants at 11000 Wilshire to provide substantially detailed comments about potentially significant environmental impacts to 11000 Wilshire. GSA submitted a formal comment letter to Caltrans on December 14, 2007 ("GSA Comment Letter"). Caltrans did not publish the GSA Comment Letter in the Final EIS as required by NEPA. Rather, on March 17, 2008, Caltrans published "errata pages" containing GSA's comment letter of December 14, 2007, which was not distributed to all the stakeholders. The method of distribution of GSA's comments should be identical to those who provided comments on a timely basis, since GSA's submission of comments after the October 1, 2007 deadline was based on Caltrans' failure to provide the environmental disclosure of the proposed action as required by law.

In *Methow Valley Citizens Council v. Regional Forester*, 833 F.2d 910 (9th Cir. 1987), the 9th Circuit set forth the legal standard that an environmental impact statement must meet. The primary purpose of an environmental impact statement is to provide decision makers with an environmental disclosure sufficiently detailed to aid in the substantive decision whether to proceed with the project in light of the environmental impacts and to provide the public with information and opportunity to participate in gathering information. *Id.* at 814. In *Oregon Environmental Council v. Kunzman*, 817 F.2d 484 (9th Cir. 1987), the 9th Circuit held that the form, content and preparation of an EIS should foster both informed decision-making and informed public participation.

GSA's inability to participate with timely comments was due to the fact that the Draft EIS did not provide the adequate disclosure of project details as required by law; as evidenced by GSA's extensive request for information about the project on July 10. GSA finds that Caltrans' justification for its failure to publish GSA's comments is inadequate since Caltrans was responsible for the late delivery of GSA's comments¹. More importantly, Caltrans EIS does not meet the legally required standard set forth in *Methow Valley* or *Oregon Environmental Council* since Caltrans had not provided the detail necessary for GSA to participate during the public scoping and public comment periods.

Further, NEPA prohibits "uninformed-rather than unwise-agency action" *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 351 (1989). NEPA also emphasizes the

¹ See March 19 letter from Ronald Kosinski, wherein Caltrans stated to GSA that "since your comment letter was received well after the end of comment period, we do not feel it is required to transmit your comments to all stakeholders."

importance of coherent and comprehensive up-front environmental analysis to ensure informed decision making to the end that the agency will not act on incomplete information....” The fact that it was necessary for GSA and Caltrans to meet repeatedly over a lengthy period well after issuance of the Draft EIS only confirms that Caltrans had failed to analyze the proposed action and its impact upon 11000 Wilshire at the Draft EIS stage with the care that is required under federal law. This lack of adequate detail about the proposed project continues in the Final EIS as described below.

In summary, the Draft EIS does not demonstrate the level of environmental disclosure and analysis required under NEPA, when the thrust of NEPA is to prevent environmentally uninformed decisions.

INADEQUATE IDENTIFICATION OF MITIGATION MEASURES

As stated above, the GSA Comment Letter resulted from GSA’s meetings with Caltrans and then GSA’s subsequent meetings with the Federal agencies occupying 11000 Wilshire. Each of these agencies carefully examined the proposed action and provided thoughtful and substantive comments as to the impacts to their mission and the safety of their employees and the public. Caltrans did not give serious consideration to these environmental impacts as evidenced by its failure to specify meaningful mitigation measures in the manner required under NEPA. Caltrans’ letter of response dated March 17, 2008 (“Caltrans Response”) to the GSA Comment Letter do not meet the legally required standard because the Caltrans Response fail to describe what specific mitigation measures Caltrans will take. The following examples are cited:

1. The FEIS Does Not Explain How It Mitigates The Complete Elimination Of Vehicular Access And Maneuvering Ability By Delivery Vehicles

The GSA Comment Letter repeats our ongoing concern that the proposed “fly-over” off-ramp interferes with access to the site and the maneuvering of large delivery trucks destined for the loading docks at the Federal Building and USPS facility at 11000 Wilshire. In its response numbers 1, 7 and 10, Cal Trans states definitively they have eliminated these impacts by a “further improved fly over” off ramp. Caltrans did not provide any written explanation, however, as to how the off ramp has been improved or how the lack of access had been completely mitigated by these improvements. Although Caltrans attached several pages of drawings to its response, no information was given as to whether the “further improved fly over” ramp is depicted on these drawings. These drawings lacked the critical details necessary to determine whether the adverse impact has been completely eliminated as represented by Caltrans.

Caltrans did, however, supplement its March 17, 2007 response by providing further revised drawings and explanations to GSA at the April 9, 2008 meeting. Although these drawings do provide an indication that Caltrans has made design changes intended to address the access and maneuvering issues, they are yet lacking in much-needed detail.

2. The Final EIS Does Not Explain How The Proposed 10' Wall Necessary To Decrease Security Risks Will Be Aesthetically Improved.

The proposed off-ramp elevates vehicles to a height of 25' above ground and closer to the Federal facilities at 11000 Wilshire. The 11000 Wilshire site contains underground and above-ground fuel storage tanks and other utilities. The off-ramp's proximity to the Federal tenants and to the tanks creates an additional security risk, which is in conflict with national security standards established by the FBI. One proposal that has been considered to mitigate these risks is construction of a security wall to be placed all along the eastern edge of the "fly-over." GSA's letter raised the concern that this security wall would be exceptionally unsightly. Caltrans' response stated that this wall would be "aesthetically treated on both sides," but did not provide any details as to what this aesthetic treatment would look like.

Overall, the mitigation measures proposed by Caltrans consist of little more than Caltrans' assertion that the above impacts will be mitigated without any explanation of *how* the impacts will be mitigated.

NEPA requires that the Final EIS contain a detailed mitigation plan. In *Northwest Indian Cemetery Protective Association v. Peterson*, 565 F.Supp. 586 (N. D. Cal, 1983), the environmental document at issue acknowledged that the particular adverse impact upon aquatic resources would be mitigated in the future without any explanation. However, the court held that the environmental document was deficient under NEPA because "this assertion neither identifies what specific mitigation measures will be taken nor evaluates the efficacy of those measures." 565 F.Supp at 602.

The mitigation measures proposed by Caltrans, like those in *Northwest Indian*, fail to meet the standards articulated under NEPA because Caltrans did not identify the specific mitigation measures. Without this detail, it is impossible to determine whether Caltrans has evaluated any of the environmental consequences. Where the EIS fails to contain a detailed mitigation plan, the agency fails to meet its obligation to foster informed decision-making and informed public participation.

Again, GSA is encouraged that Caltrans did attempt to supplement its March 17 response by providing additional details and drawings at the April 9, 2008 meeting, and has pledged to continue to meet with GSA and engage in dialog to more fully address design and mitigation issues in the near future.

LACK OF "HARD LOOK"

Section 101 of NEPA declares a broad national commitment to protecting and promoting environmental quality. In furtherance of this goal, NEPA prescribes a set of actions forcing procedures that require Federal agencies to take a "hard look" at the environmental consequences of their actions and that provide for broad dissemination of relevant environmental information. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 109 S.Ct. 1835.

Based on the above, the Final EIS does not demonstrate that Caltrans has taken the "hard look" at the proposed "fly-over" off ramp and its potentially significant environmental impacts on 11000 Wilshire. We urge Caltrans to correct the deficiencies detailed herein and publish and circulate a supplemental environmental impact statement as required by NEPA. See 40 CFR 1502.9

} 4

As noted above, GSA is encouraged that the April 9 recent meeting resulted in further disclosures of much-needed project detail. More importantly, the meeting brought a commitment between GSA, Caltrans and the other parties to continue to work together to achieve workable solutions on a number of open issues through a series of pre-design meetings over the next several weeks. GSA looks forward to this continuing dialog with Caltrans in a cooperative manner.

Sincerely,



Marilyn Park
Assistant Regional Counsel

cc: Nancy E. Bobb
Federal Highway Administration

Douglas R. Failing

Response to Comments from U.S. GSA

- 1) The NOI and NOA were published in the Federal Register per NEPA legal requirements. It is the responsibility of all potentially affected federal agencies to monitor and respond to the notices published in the Federal Register.

Caltrans/FHWA stands by the extensive outreach protocol outlined in Chapter 5 of the Final EIR/EIS. The agency/public notification and involvement process has been inclusive and, well beyond CEQA/NEPA legal requirements.

Caltrans has also conducted several meetings with GSA staff and tenants of 11000 Wilshire Blvd.

- 2) After observing the consistently high number of available parking spaces on site, Caltrans determined the temporary loss of 20 parking spaces to be an insignificant impact that would not affect the tenants of 11000 Wilshire Blvd. There would be temporary construction impacts, however, these parking spaces would be replaced in adjacent Caltrans excess land with an additional 10+ spaces. During construction parking for the tenants of 11000 Wilshire Blvd. would be easily accommodated within the federal building office parking lot.
- 3) Bridge columns have been relocated away from the loading dock ramp traveled way and shoulder. For the post office truck route, columns of Bent 4 have been moved away from the post office truck route to the raised island as much as possible. Eight to nine parking stalls adjacent to the bent will be relocated to an area within Caltrans right-of-way. This area can be transferred to GSA as mitigation. Therefore, the vehicular access and maneuvering ability of the postal office trucks will not be affected by the revised “fly-over” off-ramp design.
- 4) The fly-over design would minimize impacts to the Salvation Army Westwood Transitional Village and the Bessie Pregerson Child Development Center. Every design option has been taken into consideration and the currently proposed design would most effectively meet safety and design standards. Access to and from this federal facility would be improved as a result of this more efficient interchange design.

The following five alternatives were analyzed:

- (1) Interchange similar to existing: Due to freeway widening, the interchange operation and accidents in this alternative would be worse than the current one. This alternative would be more congested and less safe. This alternative is not viable.
- (2) Partial cloverleaf interchange: This alternative would lose two connections that constitute a quarter of the total accesses and require installation of two additional traffic signals at the ramp termini along Wilshire Boulevard. This alternative will result in more congestion and accidents on freeway and local streets and compromise the efficiency of this heavily traveled interchange. Therefore, this alternative is not viable.

- (3) Diamond interchange: This alternative would lose four connections that constitute half of the total accesses and require installation of two additional traffic signals at the ramp termini along Wilshire Boulevard. This alternative will result in severe congestion and more accidents on freeway and local streets and compromise the efficiency of this heavily traveled interchange. Therefore, this alternative is not viable.
- (4) Shortened cloverleaf interchange: This design was similar to the GSA recommended plan that shortened the northbound on-ramp and moved the ramp closer to the Sepulveda Boulevard intersection in order to reduce impacts on the federal property. This on-ramp goes over the northbound 405 off-ramp to the eastbound Wilshire Boulevard. This alternative created two non-standard curves, shortened the weaving distance from the Sepulveda Boulevard to the beginning of the on-ramp. The short storage of the northbound 405 off-ramp to eastbound Wilshire Boulevard can cause freeway traffic congestion and block traffic from the northbound Santa Monica Boulevard on-ramp. The grade was also too steep for vehicles to travel. Therefore, this alternative is not viable.
- (5) An advanced cloverleaf interchange: This alternative would overcome all the shortcomings of the above four alternatives. It would eliminate all weaving sections and weaving related accidents. It would increase traveling speed and ramp storage capacity. It has higher efficiency and less congestion. The traffic congestion in the interchange and the Wilshire Boulevard/Sepulveda Boulevard intersection will be improved by this alternative. Therefore, this design is viable and has been selected.

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



RECEIVED
APR 07 2008

March 24, 2008

Mr. Ronald J. Kosinski, Deputy District Director *RJC*
Division of Environmental Planning
Department of Transportation, District 7
100 South Main Street MS-16A
Los Angeles, California 90012

**Interstate 405 Sepulveda Pass Widening Project
Final Environmental Impact Report/
Environmental Impact Statement
and Section 4(f) Evaluation**

Dear Mr. Kosinski:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation for the Interstate 405 Sepulveda Pass Widening Project (Project). The Conservancy appreciates the ongoing collaboration and cooperation with the California Department of Transportation (Caltrans) in the design and construction of the Skirball Center Drive wildlife bridge across Interstate 405 (I-405) and the design and construction of the culvert for funneling wildlife under the northbound on-ramp at the Getty Trailhead. The Conservancy supports Alternative 2, identified by Caltrans as the preferred alternative, with the following additional recommendations.

The Conservancy supports Caltrans' Alternative 2 design for the southbound I-405 Skirball Center Drive interchange which moves the congestion and infrastructure south of the existing intersection. In addition to relieving traffic congestion around this interchange, the relocation of the interchange will significantly improve conditions for wildlife crossing Sepulveda Boulevard and I-405 using the Skirball Center Drive wildlife bridge. More specifically, the greater the distance between the Skirball Center Drive overpass and the proposed intersection relocation the less pavement, lighting, and noise there will be for animals making the crossing. The preferred alternative creates an invaluable pocket of wildlife habitat between the street and freeway. No other project alternative, including the no project alternative, can achieve this level of wildlife crossing function.

1

In addition to the construction of the Skirball Center Drive wildlife bridge, the certified Final Environmental Impact Report (FEIR) must include a mitigation measure for Caltrans to fund a consultant with extensive experience and knowledge in designing and constructing underpasses. The consultant would analyze and design the construction of the Conservancy proposed Sepulveda Boulevard undercrossing that connects the west-side of Sepulveda Boulevard to the proposed wildlife staging area at the west end of the Skirball Center Drive bridge. Our fiscal analysis reveals that the project budget can afford hiring such a consultant. The cumulative impacts on east-west wildlife movement from construction and increase of vehicular capacity on I-405 justifies the need to analyze and design such infrastructure. It is imperative that the construction of the Sepulveda Bridge undercrossing be as successful and effective as the Skirball Center Drive wildlife bridge for more than a bare minimum of wildlife movement into the eastern Santa Monica Mountains. \$400,000 should be a minimum funding figure because of the complexity of utilities under Sepulveda Boulevard.

2

In addition to the Conservancy's July 9, 2007 comments regarding the design of the Skirball Center Drive wildlife bridge, we request the following additional mitigation measure or conditions to be included in the certified FEIR. Caltrans shall provide a water meter, and a 3/4-inch diameter pipe on the east side of Skirball Center Drive near the wildlife staging area at the bridge's eastern terminus on Conservancy-owned land. The water source would help mitigate cumulative impacts to habitat degradation in Sepulveda Pass and will help encourage wildlife to make use of the Skirball Center Drive wildlife bridge. Caltrans shall provide a similar seepage pipe for the proposed northbound on-ramp at Getty View Trailhead. The seepage pipe shall be located near the eastside of the proposed culvert that will funnel wildlife under the proposed northbound on-ramp. Because the Conservancy owns the land where both artificial seeps would be, the Conservancy should control the flow and Caltrans should pay for the water. Both water sources would also create small wetlands.

3

Since the construction of the Getty View Trailhead and the Skirball Trailhead on Conservancy parkland, materials and construction costs have risen. As previously stated (October 22, 2007) the in-lieu fee agreement with Caltrans must reflect such increases including the Mountains Recreation and Conservation Authority staff time spent for arranging reimbursement of funding sources and all the planning and environmental work necessary to create replacement facilities.

4

Interstate 405 Sepulveda Pass Project Final EIR/EIS Comments
March 24, 2008
Page 3

Please direct any questions or future correspondence to Paul Edelman of our staff at (310)
589-3200, ext. 128.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. P. Schaffer", written in a cursive style.

RONALD P. SCHAFER
Chairperson

Response to Comments from the Santa Monica Mountains Conservancy

- 1) Relocation of the Skirball ramps to the south would address a critical existing traffic operations issue posed by the current configuration. LADOT officials, based on analysis conducted by its staff, has concluded that the ramp relocation would be beneficial to traffic conditions in the immediate vicinity and have urged Caltrans to consider this proposal. This project component may be deferred if increases in the construction cost exceed the project budget.
- 2) Since Sepulveda Blvd. is within the jurisdiction of the City of Los Angeles, the Santa Monica Mountains Conservancy should involve the City of Los Angeles and coordinate closely with the City as well as Caltrans. We do not feel it is Caltrans' sole responsibility to fully fund a consultant with extensive experience and knowledge of designing and constructing underpasses. Caltrans will work with the City of Los Angeles, the Santa Monica Mountains Conservancy and other interested parties to secure a multi-agency funded future project for a wildlife crossing under or over Sepulveda Blvd., south of Skirball Center Dr.
- 3) The proposed additional mitigation measure to provide a water meter and a ¾-inch diameter pipe on the east side of Skirball Center Dr. and at the end of the proposed culvert at the Getty View Trailhead under the new on-ramp will be considered to mitigate the cumulative impacts to habitat degradation in the Sepulveda Pass. The Santa Monica Mountains Conservancy must provide specifications for the Design-Build contractor in order to provide the suggested mitigation which must be outside Caltrans right-of-way. However, Caltrans cannot enter into a long-term agreement to maintain and provide funding for these artificial seeps since these devices would be outside State right-of-way and within the Santa Monica Mountains Conservancy jurisdiction. Additionally, long-term maintenance of wildlife guzzler devices is not a mandate the Department is equipped to fulfill.
- 4) The following Year 2008 cost estimates are based on a 7% increase per year since 1996:
 - Getty View Trailhead - \$359,900
 - Skirball Trailhead - \$59,000

WESTWOOD HILLS PROPERTY OWNERS ASSOCIATION

11147 Ophir Drive Los Angeles CA 90024 310) 472 9352 chmagnuson@mac.com

April 9, 2008

RECEIVED

APR 10 2008

Mr. Douglas Failing
District Director
Department of Transportation
District 7
100 S Main Street
Los Angeles CA 90012

Mr. Ron Kosinski
Deputy Director, Environmental Affairs
Department of Transportation
District 7
100 S Main Street
Los Angeles CA 90012

RE: I-405 Sepulveda Pass HOV Widening Project-Final EIR/EIS

Dear Mr. Failing and Mr. Kosinski:

The Westwood Hills Property Owners Association believes that the Final EIS/EIR fails to provide the substantial evidence required for certification of the FEIR and approval of the project. In the interest of sound government and public safety, Caltrans should delay further action on the Project until serious deficiencies in the circulated document are corrected. Environmental law and responsible leadership demand that the safety of a project be established before it is approved for construction.

1. The FEIR Must Be Amended to Reflect Changed Circumstances in the Project Area.

A disastrous landslide occurred in early March on a portion of the slope in the area immediately east of Sepulveda Blvd. between Montana Avenue and Bronwood Avenue where Caltrans plans construction. Fortunately no one was killed or injured when the slope behind 329 S. Thurston gave way during the early morning rush hour, but the landslide left one family homeless and another home yellow-tagged. The slide closed Sepulveda Blvd. to traffic for a full day, dramatically snarling traffic and inconveniencing many thousands of persons throughout the Los Angeles Basin, and left thousands of homes on both sides of the 405 without power for as many as 15 hours.

This landslide and its consequences constitute "a substantial adverse change in physical conditions," that should halt Caltrans' rush to approve this project. The current project proposes to cut into the hillside where the slide occurred by 35 to 45 feet and to attempt to retain the sheer slope face that results with walls from 20 to 50 feet high. The

1

Westwood Hills Property Owners Association raised the question of the stability of this hillside several times during the DEIR review period. In its FEIR, Caltrans cavalierly addresses our concerns (see FEIR p 521) by stating only that "...the need for additional subsurface soil investigations is noted prior to construction..." The truth and the inadequacy of that statement are amply demonstrated by the slide of March 7, 2008.

1

2. The FEIR fails to Analyze and Disclose the Project's Potential Impacts on the Stability of Slopes Adjacent to Sepulveda Blvd.

The FEIR's brief section on Geology is based on information obtained from a Preliminary Geotechnical Investigation Report dated April 2000 and a reevaluation of the project from an updated memo dated April 2006. No data is provided or summarized in the FEIR document and it is not even clear that any analysis of the subject Sepulveda slope occurred.

The FEIR in Section 3 states that "this section also discusses geology, soils, and seismic concerns, as they relate to public safety." And later "All build alternatives would require minor changes to the topography immediately adjacent to the freeway as fill slopes and retaining walls are modified and over crossings are constructed. No unique geologic or physical features are present in the project area." (Sec. 3.11.2) This statement is so general as to render it useless in understanding the conditions that pertain in the slide area and no data specific to the Thurston/Dalkeith Slope is provided.

2

We also object to the FEIR's characterization of the proposed realignment of Sepulveda Blvd. as "minor" or "slight." The Westwood Hills Property Owners Association does not believe that a responsible decision-maker can conclude from the FEIR's paltry analysis that a realignment that requires slope cuts equal to three or more standard-width, 12-foot freeway lanes, is so minor that it does not need to be reported or discussed in the project FEIR. We also submit that the disastrous landslide of March 7, 2008, provides powerful evidence to the contrary. Caltrans must do additional study and provide further evidence that this plan to relocate Sepulveda Blvd. can be implemented safely before it approves this project.

3. The FEIR Fails to Provide a Stable and Unambiguous Description of the Project in the Area Where Slope Failure Recently Occurred.

The FEIR states repeatedly that "Sepulveda Blvd. will be realigned between Montana Ave. and Moraga Dr., in order to accommodate freeway widening...Even with the application of reduced design standards, Sepulveda Blvd. will still have to be realigned through this area..." (DHN-2, JW-6, KS-2, and others). These statements suggest erroneously that reduced design standards have been applied along the entire freeway section from Montana to Moraga. To the contrary, in most of this section, Caltrans maintains standard width freeway lanes, as well as generous median and shoulder, requiring it to take a portion of the City of Los Angeles right of way (LADOT-6), requiring the realignment of Sepulveda Blvd., and consequent cuts into the hillside.

3

The Westwood Hills Property Owners Association has asked many times for a firm and final determination of where the eastern boundary of the realigned Sepulveda Blvd., will fall but as of this date, the information has not been provided, perhaps because Caltrans *does not yet know*. In the FEIR, the Sepulveda realignment is described as "up to 30'" (LADOT), or "0 to 26'" (DHN-2), or "22 feet" (JW-6). In the interest of public safety, this uncertainty about

how much realignment of Sepulveda is required must be resolved before Caltrans approves a design that will require realignment of Sepulveda Blvd. and the consequent impacts on the hillside, and on noise and air quality in the nearby area. The FEIR states that "*Caltrans is preparing updated Freeway Agreements and will work with the City of Los Angeles to secure their approval.*" (BR-3). Caltrans' uncertainty about the ultimate location of Sepulveda Blvd. is very likely the result of the failure to date to finalize the Freeway agreement. The FEIR states that Sepulveda will be maintained at its current width; however, that configuration is subject to change by agreement with the City. The FEIR must be amended to fully disclose the content and nature of these Freeway agreements and their potential impacts on the stability of the east side of Sepulveda Blvd., so that the public can be confident that potential impacts are understood and can be mitigated. Caltrans cannot approve a project until it can provide a stable and unambiguous description of all project elements.

3

4. The FEIR Fails to Analyze and Mitigate the Project's Potential Impacts on Air Quality and Health During Construction and Freeway Operation .

The FEIR acknowledges that the purpose of the project is to increase capacity on the Northbound 405, yet it does not evaluate the potential air quality and health impacts of the extra vehicles, calculated conservatively at 20,400 extra trips per day (FEIR, page 476.) In failing to analyze and report these impacts, Caltrans ignores the most current protocols of the Environmental Protection Agency and puts at risk the health and welfare of all persons who breathe the air in the Southern California Air Basin. (FEIR 404, 405).

Caltrans chooses also to ignore SCQAMD requirements for daily attainment, developed pursuant to Federal mandate, by dismissing its responsibility to analyze construction-related air and health impacts because they are "temporary" impacts (SCAQMD-1, AG-17, among others) in spite of the fact that construction on the 405 Freeway SB from the Valley to the Airport has been going on for ten years and construction on the northbound project is anticipated to take from five to seven years.

4

Freeway construction in Los Angeles is not a "temporary" activity within the meaning and intent of the law or human experience. A child born at the start of the southbound project will be in junior high school by the end of the northbound project and will have been exposed to construction-related pollution for his or her entire life. The FEIR fails in its duty to fully inform decision makers of the impacts of their decisions on the health and welfare of large numbers of persons, including children, who live within the air shed of the 405, and should be corrected.

5. The FEIR Fails to Provide Analysis and Data to Support Its Inclusion of a Southbound Left-Turn Pocket and Signal at Sepulveda Blvd. and Homdale Ave.

The FEIR does not provide information required to support its last minute inclusion of this signal as a project mitigation. The proposed signal and southbound left-turn pocket are included as mitigation measures for traffic impacts associated with the closure of the northbound Montana Avenue off-ramp from the 405 widening project. The FEIR provides no data or rationale to support the assumption that this southbound signal will in fact mitigate northbound traffic that will be exiting on Sunset Blvd. from which Sepulveda cannot easily be reached. In fact, the so-called "mitigation" creates many negative impacts of its own that are not acknowledged in the FEIR and requires undesired additional widening in the area of the recent landslide (LADOT-6).

5

This signal imposes a burden on the neighborhood that would itself require mitigation by facilitating cut-through traffic in the residential neighborhood. At existing levels, cut through traffic in the neighborhood is a safety hazard. The streets immediately east of Sepulveda are narrow, winding, and sometimes steep. Cut through drivers, often bound for UCLA and the Wilshire Corridor, often attempt to navigate the streets at unsafe speeds, endangering children riding bikes and playing, children in strollers, elderly pedestrians, and others in the neighborhood, as well as resident motorists. The so-called mitigation would make this situation worse.

Closure of the Montana off-ramp will improve traffic flow on both northbound and southbound Sepulveda by eliminating the signal cycle that facilitates traffic exiting the freeway. The so-called mitigation at Homedale and Sepulveda would negate this traffic flow improvement by needlessly interrupting the southbound traffic flow on Sepulveda. Adding a signal at Homedale does NOT make it easier for residents to get into the neighborhood from northbound Sepulveda. At present, those residents traveling northbound from the 405 off-ramp make a right turn at Homedale they will continue to do from northbound Sepulveda. Those exiting at Sunset will travel east to S. Thurston and south to Homedale, just as they do now.

Residents of homes on street backing on to Sepulveda do not deserve to have this needless burden imposed on them when already they face degradation of their quality of life as a result of increased noise, decreased air quality, loss of landscaping, long-term health impacts, diminished property value as a result of the 405 project. All of the Westwood Hills neighborhood will suffer these same impacts.

Caltrans and LADOT can do more to minimize the impacts on these neighbors and our neighborhood. For example:

1. Caltrans can redesign the section of the HOV project to avoid moving this section of Sepulveda Blvd. or it can exempt this section of the project from approval under the current FEIR.

2. Caltrans can reduce intrusion into our neighborhood by leaving existing northbound lanes at 11-feet each, thereby saving a precious five feet that can be used to increase the buffer between the homes and the retaining walls and minimize impacts on the hillsides.

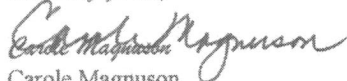
3. Caltrans can provide extra soundproofing and employ the most advanced noise reduction technology to protect homeowners from significant increases in noise that will result from the "trench" created by the new retaining walls.

5. Caltrans can install advanced technology air cleansing systems in impacted homes to reduce toxic impacts on residents within 1000 feet of the freeway.

6. Caltrans and the LADOT can ease the burden that adjacent homeowners are suffering by insuring that they will be involved in the design and installation of the retaining walls, landscape restoration, and noise mitigation.

7. Caltrans can provide a community liaison who will work with the affected homeowners on Thurston and Dalkeith to resolve issues that arise during project construction.

Sincerely yours,



Carole Magnuson
Past President/Vice President

CC: Gov. Arnold Schwarzenegger
Assemblymember Karen Bass
Assemblymember Mike Feuer
County Supervisor Zev Yaroslavsky
Mayor Antonio Villaraigosa
Councilmember Jack Weiss
Bel-Air Association
Brentwood Glen Association
Milton Miller, Esq

Response to Comments from the Westwood Hills Property Owners Association

1. At this time, the City of Los Angeles Bureau of Engineering is investigating the landslide that occurred on March 6, 2008 in this area which falls within the City of Los Angeles' jurisdiction. Caltrans geotechnical specialists have been in coordination with the City of LA Bureau of Engineering.

Caltrans also recently conducted test drilling on the local streets in this area for the I-405 Sepulveda Pass Widening Project. Once subsurface information is analyzed, Caltrans will coordinate with the City of Los Angeles to ensure that every appropriate measure is implemented to stabilize the hillside prior to and during construction. Meanwhile, we are confident that the City is carefully evaluating the current situation and will implement precautionary measures to ensure commuter safety, protect property and ensure that power and other services remain reliable.

Although the recent landslide was an unforeseen event, Section 3.11.5 of the Draft and Final EIS pointed out the possibility of encountering "ground shaking, landslides, liquefaction and other...constraints that pose a potential hazard for all...projects in Southern California." If the geotechnical investigation reveals new information that bear on the proposed action or the significance of its impacts, the appropriate NEPA documentation would be prepared by Caltrans, as necessary.

2. The 10.2-mile I-405 Sepulveda Pass Project will require a realignment of Sepulveda Blvd. for a $\frac{3}{4}$ -mile segment between Montana Ave. and Ovada Place/Church Lane. The proposed realignment calls for a maximum shift of approximately 30 feet. The realignment will reduce the geometric curvature of the roadway, thus improving safety. Elements of this project will improve capacity and overall safety and will also allow for future improvements to the transportation network.

Caltrans implements stringent engineering standards that address the stability of hillsides. These standards were developed to address numerous projects throughout the State. The current Caltrans standards contains slope stabilization measures and procedures that are applicable for every project. The recent landslide does not change Caltrans' process of conducting extensive and detailed geological testing for every project. The standard procedure for these investigations occurs during the final design process. The final slope stability determination will be performed by the Design-Build contractor under Caltrans oversight. Caltrans will implement the latest seismic standards in its design and structures with special features will be designed to minimize potential structural damage due to groundshaking.

3. The reduced design standards statement is correct. The median width has been reduced and the 4' buffer standard has been eliminated. The description for the project is accurate, to the level of detail required to determine the significance of project impacts. Caltrans has made a great effort in providing approximate boundaries and individual cross-sections, in addition to the plans shown at the public hearing and multiple community meetings. Currently, we are working to provide individual property owners cross-sections in this area. The exact final

location and type of the retaining wall will be based on extensive engineering data, including subsurface information obtained from geotechnical testing.

The Freeway Agreement for this project between Caltrans and the City of Los Angeles are carried out by Caltrans Design Chief and the City of Los Angeles Department of Transportation Manager for State funded projects. The Freeway Agreement is executed subsequent to NEPA approval and if substantial project changes result, the appropriate NEPA documentation will be prepared.

4. The 20,400 extra trips per day identified are an increase in capacity, not necessarily an increase in actual volume projected to use the roadway. The increase in capacity is consistent with the traffic analysis as it indicates that the increase in capacity will help enhance operations. The traffic analysis does not project any increase in future volumes of the Build compared to the No-Build. The enhanced operations result in reduction of congestion as the speeds tend to improve; and in turn leads to improvement in emissions.

Please also refer to Caltrans response to comments received from the Environmental Protection Agency (EPA) regarding air quality (page 33-34 of this ROD).

Based on the current schedule, construction of the project is targeted to take 4 years; overall activities will not last more than 5 years. As such, emissions are considered temporary in conformity hot-spot analyses according to 40 CFR 93.123(c)(5).

5. The proposal for the Homedale signal was developed based on input from elected representatives of the community. The FEIR/EIS included the Homedale signal as a mitigation measure based on a preliminary assessment of the traffic patterns in the area. However, the installation of the signal will still require further analysis before implementation. Caltrans will continue to coordinate with LADOT to determine if this signal is warranted.
6. Caltrans and LADOT appreciate your recommendations for minimizing neighborhood impacts:
 - 1) The recommendation to redesign this section of the HOV project to avoid realigning Sepulveda Blvd. would involve design exceptions that have been considered and denied by FHWA/Caltrans Design Geometricians.
 - 2) The recommendation to leave existing northbound lanes at 11-feet each would involve design exceptions that have been considered and denied by FHWA/Caltrans Design Geometricians.
 - 3) Further noise investigation for the houses located east of I-405 between Montana Ave. and Sunset Blvd. will be conducted to determine if they qualify for interior noise abatement because severe traffic noise impacts are identified for which there is no feasible or reasonable solution.
 - 4) Your letter omitted a recommendation #4.
 - 5) The State of California cannot make a commitment to install advanced technology air cleansing systems. Please also refer to Caltrans response to comments received from the EPA regarding improved air quality (page 33-34 of this ROD).

- 6) Caltrans will coordinate with the community to minimize impacts during construction and will involve the community on important issues, including the design of retaining walls, landscaping and noise mitigation.
- 7) Caltrans will coordinate with the community to address issues that arise during project construction and have a community liaison office in the corridor.

SANDIFER

255 South Thurston Avenue Los Angeles, CA 90049 ph: 310/889-1883 kimsandifer@msn.com

April 10, 2008

Mr. Douglas Failing
District Director
Department of Transportation
District 7
100 S Main Street
Los Angeles CA 90012

RECEIVED
APR 15 2008

Mr. Ron Kosinski *rk*
Deputy Director, Environmental Affairs
Department of Transportation
District 7
100 S Main Street
Los Angeles CA 90012

RE: I-405 Sepulveda Pass HOV Widening Project-Final EIR/EIS

Dear Mr. Failing and Mr. Kosinski:

As a resident of Westwood Hills who will be substantially affected by the proposed Northbound 405 widening, I believe that the Final EIS/EIR does not provide enough information about the potential environmental impacts in this area to ensure that the project can be implemented with risking the safety of those who live in and drive through the area. As the recent landslide demonstrates, the slope area just east of Sepulveda is subject to failure but is completely unexamined the FEIR.

For this reason I call on you to delay approval of the project until more information is provided. At a minimum, Caltrans should provide 1) a stable project description so that we can know what the impacts of realigning Sepulveda will be; 2) full investigation and disclosure of soil conditions in the area of the recent landslide on Sepulveda Blvd. so that the safety of proceeding with realignment of Sepulveda Blvd. can be known to those who will approve the project; 3) full investigation and disclosure of the impact of construction on air quality in the area, and 4) full disclosure and mitigation of noise related to freeway expansion.

In addition, Caltrans should eliminate the turn pocket and signal proposed for Sepulveda and Homedale Ave. because, in addition to being useless as a mitigation, the signal would itself require mitigation by facilitating cut-through traffic in the residential neighborhood.

Sincerely,

Kim and Dominic Sandifer
Kim and Dominic Sandifer
255 South Thurston Ave.
Los Angeles, CA 90049
kimsandifer@msn.com

Response to Comments from Kim and Dominic Sandifer

Please see Caltrans response to comments received from the Westwood Hills Property Owners Association (page 52-54 of this ROD).

Kevin and Lisa Cook
251 S. Thurston Ave.
Los Angeles, CA 90049

RECEIVED
APR 17 2008

April 14, 2008

Mr. Douglas Failing
District Director
Department of Transportation
District 7
100 S Main Street
Los Angeles CA 90012

Mr. Ron Kosinski *RC*
Deputy Director, Environmental Affairs
Department of Transportation
District 7
100 S Main Street
Los Angeles CA 90012

RE: I-405 Sepulveda Pass HOV Widening Project-Final EIR/EIS

Dear Mr. Failing and Mr. Kosinski:

As a resident of Westwood Hills who will be substantially affected by the proposed Northbound 405 widening, I believe that the Final EIS/EIR does not provide enough information about the potential environmental impacts in this area to ensure that the project can be implemented without risking the safety of those who live in and drive through the area.

Case in point, please consider the recent landslide in our neighborhood. Obviously, those particular homeowners directly affected are bearing the worst impact. However, our entire neighborhood was impacted. On the day of the slide, our streets were filled with cars, bumper to bumper. It took us ten minutes just to pull out of our driveway! This was a nuisance to us (kids late to school, etc.), but it could have been a disaster in the event of an emergency. Anyone who has driven through our neighborhood will attest to the fact that the streets are very narrow and cannot handle significant traffic flow. We are very concerned that the construction on Sepulveda will cause a marked increase in the through-traffic in our neighborhood for the years during the construction phase. Moreover, adding the pocket lane and turn signal at Homedale will encourage commuters to cut through our neighborhood indefinitely.

For the safety of my four children and the many other children that play in the neighborhood, as well as for the peace of mind of knowing that emergency vehicles can reach our neighbors in a timely manner, Caltrans must do additional study and provide further evidence that this plan to relocate Sepulveda Blvd. can be implemented safely before it approves this project.

Please delay approval of the project until more information is provided. At a minimum, Caltrans should 1) eliminate the turn pocket and signal proposed for Sepulveda and Homedale Ave.; and 2) consider closing the entrances into Westwood Hills at Homedale and

Bronwood to eliminate cut-through traffic. Furthermore Caltrans must provide: 3) a stable project description so that we can know what the impacts of realigning Sepulveda will be; 4) full investigation of the impact of the project on traffic patterns in Westwood Hills; 5) full investigation and disclosure of soil conditions in the area of the recent landslide on Sepulveda Blvd. so that the safety of proceeding with realignment of Sepulveda Blvd. can be known to those who will approve the project; 6) full investigation and disclosure of the impact of construction on air quality in the area, and 7) full disclosure and mitigation of noise related to freeway expansion.

Sincerely yours,



The Cooks (Kevin, Lisa, Andie, Davis, Caroline, and Keira)
Concerned Westwood Hills Residents

CC: Gov. Arnold Schwarzenegger
Assemblymember Karen Bass
Assemblymember Mike Feuer
County Supervisor Zev Yaroslavsky
Mayor Antonio Villaraigosa
Councilmember Jack Weiss
Bel-Air Association
Brentwood Glen Association
Milton Miller, Esq

Response to Comments from Kevin and Lisa Cook

Please see Caltrans response to comments received from the Westwood Hills Property Owners Association (page 52-54 of this ROD).

CHET R. BHAVSAR
301 S. THURSTON AVENUE
LOS ANGELES, CALIFORNIA 90049
CHETBHAVSAR@YAHOO.COM
(213) 509-0252

RECEIVED

APR 14 2008

April 14, 2008

Via Hand Delivery and U.S. Mail

Douglas Failing
District Director, District 7
DEPARTMENT OF TRANSPORTATION
100 S. Main St., Suite 100 (13th Floor)
Los Angeles, California 90012

Ron Kosinski 
Deputy Director, District 7
DEPARTMENT OF TRANSPORTATION
100 S. Main St., Suite 100 (13th Floor)
Los Angeles, California 90012

Re: 405 Sepulveda Pass HOV Project and Final EIR/EIS

Dear Mr. Failing and Mr. Kosinski:

As a resident of the Westwood Hills neighborhood, between Montana Ave. and Sunset Blvd., I am concerned about the affects on my neighborhood from the proposed northbound 405 expansion project. Caltrans has identified significant unavoidable impacts to my neighborhood. CEQA requires that Caltrans adopt all feasible mitigation measures that would significantly reduce the impacts of the project before a statement of overriding considerations for the project can be adopted. (Public Resources Code §21081) In conjunction with prior comments from other residents of my neighborhood, I believe the following additional mitigation measures are feasible and would significantly reduce the impacts of this project to the neighborhood:

1. Improvement and enhancement of the western boundary retaining walls of the Westwood Hills neighborhood, including the design and construction of retaining walls to current code and safety standards. Additionally, creation of an aesthetic wall similar to the Getty Center on the southbound 405. Westwood Hills should have sign-off authority before implementation. } 1

Douglas Failing
Ronald Kosinski
April 14, 2008
Page 2

2. The power lines that are currently on Sepulveda Blvd. should be buried under Sepulveda Blvd. Additionally, homes within a prescribed distance from underground gas lines on Sepulveda Blvd. should be fitted with modern gas shut-off valves. } 2
3. Traffic concerns to the neighborhood should be minimized by configuring the Bronwood and Homedale entrances for residents only, slowing traffic in the neighborhood with the placement of speed bumps and ensuring that emergency vehicles can access the neighborhood in a timely and efficient manner. } 3
4. Noise, air quality and pollution issues should be resolved with insulation and quadruple paned windows and air filtration systems for residents. } 4
5. Construction should not be performed at night, which would disturb the residents of the neighborhood and Caltrans must insure that parking problems do not arise in the neighborhood during construction. } 5

The Final EIR also states that some elements of the project may be eliminated based on funding. Caltrans must identify what those elements are, and it must ensure measures identified in the EIR to mitigate impacts are not eliminated from the project.

Additionally, I believe that the Final EIR/EIS does not provide enough information about the potential environmental impacts in this area to ensure that the project can be implemented without risking the safety of the residents of our neighborhood and commuter traffic in the area. As the recent landslide demonstrates, the slope area east of Sepulveda is subject to failure, which is completely ignored by the Final EIR. For these reasons, I request that the approval of the project is delayed until more information is provided. At a minimum, Caltrans should provide:

1. A stable project description so we know what the impacts of realigning Sepulveda will be. } 6

Douglas Failing
Ronald Kosinski
April 14, 2008
Page 3

2. Full investigation and disclosure of soil conditions in the area of the recent landslide on Sepulveda Blvd., so the safety of proceeding with any proposed realignment of Sepulveda Blvd. can be known to those who will approve the project. } 7
3. Full investigation and disclosure of the impact of construction on air quality in the area. } 8
4. Full disclosure and mitigation of noise related to the freeway expansion. } 9

If you have any questions, do not hesitate to contact me.

Very truly yours,



Chet R. Bhavsar

Response to Comments from Chet R. Bhavsar

- 1) Caltrans implements stringent engineering standards that address the stability of the hillsides. These standards were developed to address numerous projects throughout the state. These Caltrans standards contain slope stabilization measures and procedures that are applicable for every project. The recent landslide does not change Caltrans' process of conducting extensive and detailed geological testing for every project. The standard procedure for these investigations occurs during the final design process. The final slope stability determination will be performed by the Design-Build contractor under Caltrans oversight.

The Caltrans Division of Landscape Architecture has prepared preliminary *Aesthetic Themes and Concepts* for the I-405 Sepulveda Pass Project which includes the overall concept for the aesthetics to improve corridor consistency and provide a transition between differing geographic regions along the route. Caltrans will coordinate with community groups including Westwood Hills as these themes and concepts are further developed.

- 2) Utilities that require relocation will be replaced and there is a possibility of undergrounding utilities along Sepulveda Blvd. as necessary and will be determined by the affected utility company and Caltrans.
- 3) The City of Los Angeles Department of Transportation would be responsible for planning and implementing neighborhood traffic calming methods in this area.
- 4) Further noise investigation for the houses located east of I-405 between Montana Avenue and Sunset Boulevard will be conducted to determine if they qualify for interior noise abatement because severe traffic noise impacts are identified for which there is no feasible or reasonable solution.

20,400 extra trips per day are an increase in capacity, not an increase in actual volume projected to use the roadway. The increase in capacity is consistent with the traffic analysis as it indicates that the increase in capacity will help enhance operations. The traffic analysis does not project any increase in future volumes of the Build compared to the No-Build. The enhanced operations result in reduction of congestion as the speeds tend to improve; and in turn leads to improvement in emissions.

Based on the current schedule, construction of the project will not last more than 5 years and such emissions are considered temporary in conformity hot-spot analyses according to 40 CFR 93.123(c)(5)

- 5) Sensitive receptors are considered as part of the freeway design process. Night construction in noise sensitive areas will be minimized to the maximum feasible extent. A construction staging plan will also be prepared to minimize impacts to sensitive receptors. All night-time construction will consider the City's Noise Ordinance and is subject to the requirements contained in Los Angeles Municipal Code Ordinance No. 144.331.

A construction Traffic Management Plan (TMP) will minimize parking impacts during the construction period.

- 6) The description for the project is accurate, to the level of detail required to determine the significance of project impacts. Caltrans has made a great effort in providing approximate boundaries and individual cross-sections, in addition to the plans shown at the public hearing and multiple community meetings. Currently, we are working to provide individual property owners cross-sections in this area. The exact final location and type of the retaining wall will be based on extensive engineering data, including subsurface information obtained from geotechnical testing.
- 7) Please see response to comment #1 regarding soil conditions in the project area.
- 8) As construction of the project is expected to last about four years, construction-related emissions were not considered in the hot-spot analysis. Implementation of the proposed project will be required to comply with the South Coast Air Quality Management District's fugitive dust control measures listed in Rules 402 and 403.
- 9) The Final EIR/EIS (page 208-230) provided information regarding noise impacts and mitigation measures. Soundwalls will be constructed according to the recommendations provided in the I-405 Sepulveda Pass Project Noise Study Report and Supplemental Noise Study Report. A final decision on the installation of abatement measures would be made upon completion of the design process and tracked through construction as identified in the Mitigation Monitoring Reporting Record (MMRR) which is located in Chapter 6 of the FEIS.